

Name Sonia Sayyedalhosseini
Street Address 713 Stafford street, Apt # 46
City and County Folsom, Sacramento
State and Zip Code California, CA 95630
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FILED

JUL 31 2023

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

Sonia Sayyedalhosseini

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

- 1) Losrios Community College District, et al.
- 2) Folsom Lake College (as a branch of Losrios Community College District)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**Complaint for Employment
Discrimination**

Case No. 2:23-cv-1571 DAD AC (PS)
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☒ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Sonia Sayyedalhoseini</u>
Street Address	<u>713 Stafford street, Apt # 46</u>
City and County	<u>Folsom, Sacramento</u>
State and Zip Code	<u>California, CA 95630</u>
Telephone Number	<u>(916) 517- 8294</u>
E-mail Address	<u>soniaseyedalhoseini@yahoo.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Losrios Community College District, et al.</u>
Job or Title (if known)	<u></u>
Street Address	<u>1919 Spanos Ct.</u>
City and County	<u>Sacramento</u>
State and Zip Code	<u>California, CA 95825</u>
Telephone Number	<u>(916) 568-3041</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Folsom Lake College (as a branch of Losrios Community College District)</u>
Job or Title (if known)	<u></u>
Street Address	<u>10 College Parkway</u>
City and County	<u>Folsom, Sacramento</u>

State and Zip Code	California, CA 95630
Telephone Number	(916) 608-6500
E-mail Address (if known)	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name	Folsom Lake College (as a branch of Losrios Community College District)
Street Address	10 College Parkway
City and County	Folsom, Sacramento
State and Zip Code	California, CA 95630
Telephone Number	(916) 608-6500

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

EEOC Investigation Result in Exhibit # 1
DOJ Lawsuit Letter in Exhibit # 2 issued
on 05-09-2023.

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

EEOC Investigation Result in Exhibit # 1
DOJ Lawsuit Letter in Exhibit # 2 issued on
05-09-2023

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Other federal law *(specify the federal law)*:

- ☐ Relevant state law *(specify, if known)*:

- ☐ Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation. As you can see in Exhibit # 1, on the third paragraph of EEOC Investigation Result mentioned: Respondant laid off me in
- ☒ Other acts (*specify*): retaliation for engaging in protected activity in violation of Title VII of civil rights act of 1964 as amended.

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

May 2020 & Fall 2020 - Spring & Fall 2021 - Spring & Fall 2022 - Spring & Fall 2023 . As you can see EEOC Investigation Result in Exhibit # 1, Local Director of EEOC mentioned that: " I have considered all the evidence disclosed during the investigation and have determined that there is reasonable cause to believe that Respondent did not assign Charging Party courses for Fall 2020 semester and laid her off from employment in retaliation for engaging in protected activity, in violation of Title VII."

C. I believe that defendant(s) (*check one*):

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*): Please see the " Attachment # 1" which is " Statement of Facts, Claims and Complaint " at the end of this form and it is supported by statements and Exhibits.

- ☐ race _____
- ☐ color _____
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age. My year of birth is _____. (*Give your year of birth only if you are asserting a claim of age discrimination.*)
- ☐ disability or perceived disability (*specify disability*) _____

E. The facts of my case are as follows. Attach additional pages if needed.

Please see the "Attachment # 1" which is " Statement of Facts, Claims and Complaint " at the end of this form and it is supported by 115 pages statements and 143 Exhibits.

Please see the "Attachment # 1" which is " Statement of Facts, Claims and Complaint " at the end of this form and it is supported by 115 pages statements and 143 Exhibits.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

As you can see in Exhibit # 8, I filed EEOC Charge # 555-2020-01235 on 09-10-2020.

- B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
☒ issued a Notice of Right to Sue letter, which I received on *(date)*

You can see EEOC Investigation Result in Exhibit # 1. You can see DOJ Lawsuit Letter in Exhibit # 2 issued on 05-09-2023
(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☐ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Please see the “ Attachment # 2 ” which is “ Statement of Relief & Demands ” at the end of this form and it is supported by statements and Exhibits.

Please see the “ Attachment # 2 ” which is “ Statement of Relief & Demands ” at the end of this form and it is supported by statements and Exhibits.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07-31, 2023

Signature of Plaintiff



Printed Name of Plaintiff

Sonia Sayyedalhousseini (Pro Se litigant)

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ABBREVIATIONS.....vi

EEOC..... Equal Employment Opportunity Commission
DOJ..... Department of Justice
PSVA.....President's Service Volunteer Award
KJM.....Honorable Judge Kimberley J. Muller
DB.....Honorable Magistrate Judge Deborah Barnes
EBM.....Editorial Board Member
OCM.....Organizing Committee Member
LRCCD.....Los Rios Community College District

FLC.....Folsom Lake College
EDC.....El Dorado Center, as sub Branch of FLC
ARC.....American River College
Lab Tech.....Laboratory Technician
WES.....U.S. World Educational Service
M.D.....Medical Doctor
LEC.....Lecture
CNSU.....California Northstate University
FPD.....Folsom Police Department
DHS.....Department of Homeland Security
FBI.....Federal Bureau of Investigation
CHRO..... Civil Harassment Restraining Orders

Attachment # 1:
Statement of Facts, Claims and
Complaint

Plaintiff: Sonia Sayyedalhosseini

VS.

Defendants: Losrios Community College District

Folsom Lake College (a branch of Losrios)

This is Professor Dr. Sonia Sayyedalhoseini, the recipient of the **prestigious “Gold-Level President’s Medal Award”** as you can see it in Exhibit # 3. I am victim of several violations of Losrios Community College District.

This complaint is against Losrios Community College District as well as Folsom Lake College (as one branch of Losrios) regarding **EEOC Charge # 555-2020-01235**. You can see **EEOC investigation results** about the above charge in Exhibit # 1 and you can find Department of Justice’s Lawsuit Letter (**DOJ Lawsuit Letter**) in Exhibit # 2 which was issued on May 9th 2023 regarding **EEOC Charge # 555-2020-01235**.

Most of the Losrios Community College District’s violations regarding **Charge # 555-2020-01235** already have been investigated by U.S. Equal Employment Opportunity Commission (EEOC) and as you can see in Exhibit # 1, the EEOC investigation result (EEOC Determination Letter) regarding **Charge # 555-2020-01235** **proves** and **establishes** this point that **Losrios Community College District is guilty in violation of Title VII of my Civil Rights.**

So, the concept of this statement as well as its Exhibits are for further clarification otherwise these were already investigated by EEOC.

You can find “Table of Contents” which attached to the beginning of complaint, this is is **“Statement of Facts, Claims and Complaint”** and it includes 9 section as below:

I. Introduction: Brief Explanation of Case

II. My Credibility: Clarification Regarding my Background

III. Violations of Employer (Losrios Community College District & Folsom Lake College as one branch of Losrios Community College District)

IV. Opposition & Objection to Reject & Rebut all Losrios’s accusations, misinformation, disinformation, dishonesty to distort the reality and also for derailment from the main subject and all the other false, fake and fabricated claims in all 3 Losrios Position Statements in response to EEOC line by line

V. Further Clarification Regarding Losrios Community College District’s Violations

VI. Niloofar Radgoudarzi’s Retaliation (Losrios’ Lab Tech who manipulated and provoked his boyfriend (Gregory McCormac, dean of biology department) against me (Niloofar is Gregory McCormac’s Girlfriend)

VII. Mehdi Radgoudarzi’s Retaliation (Losrios’ Volunteer)

VIII. Law Misconduct during EEOC Investigation by the Influence of Losrios over EEOC Investigators (by Penetrating Pathway) to Protect the Son of Their Former Dean from Justice Punishment (Gregory McCormac’s Father was a Former Dean in ARC who Has Many Connections in Losrios Administration).

IX. Conclusion of **“Statement of Facts, Claims and Complaint”**

***Section I) Introduction: Brief Explanation of Case:**

This is Professor Dr. Sonia Sayyedalhoseini, the recipient of President's Gold Medal Award for volunteer services, PVSA, in American Red Cross as you can see it in Exhibit # 3. I am victim of several violations of Losrios Community College District.

This complaint is against Losrios Community College District related to **EEOC Charge # 555-2020-01235** based on the EEOC investigation result (EEOC Determination Letter as you can see it in Exhibit # 1) and also according to the Department of Justice Lawsuit Letter (DOJ Lawsuit Letter) which was released on May 9th 2023 (as you can see it in Exhibit # 2).

Most of the Losrios Community College District's violations regarding **Charge # 555-2020-01235** already have been investigated by U.S. Equal Employment Opportunity Commission (EEOC) and as you can see in Exhibit # 1, the EEOC investigation result (EEOC Determination Letter) regarding **Charge # 555-2020-01235** **proves** this point that **Losrios Community College District is guilty in violation of Title VII of my Civil Rights.**

So, the concept of this statement as well as its Exhibits are for further clarification otherwise these were already investigated by EEOC.

I was retaliated against for engaging in protected activity after I filed an EEOC Charge of Discrimination in March 2020 because I was subjected to sexual harassment by Gregory McCormac (the Dean of Biology Department).

In addition to it, my husband (Prof. Dr. Seyed Saeid, Zamanieh Shahri) was subjected to retaliation by Greg, **NOT ONLY** as a Result of Reporting Greg's Sexual Harassment by me, **but also** because I had Rejected Illegal, Unethical and Shameful Requests/Behavior of Niloofar Radgoudarzi (the Night Shift Lab Tech in FLC Main Campus) who was Gregory McCormac's girlfriend.

I have clarified all violations and crimes of Gregory McCormac in **Section III** (page # to page #) of this statement. I also have explained all violations and crimes of Niloofar Radgoudarzi (Gregory McCormac's girlfriend) who is Lab Tech in Losrios in **Section VI** (page # to page #) of this statement.

Besides that, I have mentioned all violations and crimes of Mehdi Radgoudarzi (Niloofar's father) who was volunteer in Losrios in **Section VII** (page # to page #) of this statement.

After I filed complaint in March 2020 with EEOC against Gregory McCormac as well as his girlfriend (Niloofar Radgoudarzi), I was laid off by Respondent on May 21, 2020 and not assigned any courses to teach for the Fall 2020 school semester because of my earlier complaint filed with EEOC in March 2020.

Accordingly, as you can see in Exhibit # 8, I filed federal **Charge # 555-2020-01235** against my employer (Losrios Community College District) on **September 2020** in

U.S. Equal Employment Opportunity Commission (EEOC).

U.S. Equal Employment Opportunity Commission (EEOC) investigated all evidence, proofs, documents and statements which they received from parties regarding **charge # 555-2020-01235** since **September 2020**. Those documents and evidence include:

My Charge of Employment Discrimination, Respondent's Position Statement (Losrios Community College District's Response to my Complaint), Petitioner's Hereinafter charge (my Rebuttal to Reject Respondent's Position Statement) and

Since September 2020, the U.S. Equal Employment Opportunity Commission (EEOC) investigated all the above documents and finally, **after 2 years investigation**, EEOC's Determination came up on **August 23rd 2022**.

As you can see in Exhibit # 1, on EEOC Determination Letter which has been released on August 23rd 2022, EEOC's Director of Oakland on behalf of the Commission has mentioned to **following important federal investigation's results**:

- On the **first paragraph** of Exhibit # 1 mentioned:

"Under the authority vested in me by the U.S. Equal Employment Opportunity Commission (hereinafter "Commission"), **I issue the following determination as to the merits of the subject charge filed under Title VII of the Civil Rights Act of 1964, as amended (hereinafter "Title VII"). All requirements for coverage have been met.**"

- On the **third paragraph** of Exhibit # 1 mentioned:

"I have **considered all the evidence** disclosed during the investigation and have determined that **there is reasonable cause to believe that Respondent did not assign Charging Party courses for Fall 2020 semester and laid her off from employment in retaliation for engaging in protected activity, in violation of Title VII.**"

- On the **fourth paragraph** of Exhibit # 1 mentioned:

"Upon finding that **there is reason to believe that violations have occurred, the Commission attempts to eliminate the alleged unlawful practices** by informal methods of conciliation."

The EEOC Determination Letter regarding Charge # 555-2020-01235 **proves** this point that on the results of EEOC investigation which came up on **August 23rd 2022**, **Losrios Community College District was known guilty in violation of Title VII of my Civil Rights.**

This EEOC Determination Letter **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements which has been given to EEOC for investigation, are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) for Spring 2022 and

You can see those accusations in all 3 Losrios Position Statements in Exhibit # 57, Exhibit # 58 and Exhibit # 59. The Losrios position statement regarding this **EEOC charge # 555-2020-01235** has been placed in Exhibit # 57.

I have mentioned to all of the Losrios Community College District's violations against me in **Section III** of this statement.

After investigation results, based on EEOC's invitation to join with it in reaching a just resolution of this matter, so, I did my best to conciliate charge # 555-2020-01235 in EEOC but unfortunately Losrios Community College District did not.

As you can see in Exhibit # 4, on September 7th 2022, EEOC's Director of Oakland on behalf of the Commission has mentioned that:

"The Commission has determined that efforts to conciliate this charge as required Title VII of the Civil Rights Act of 1964 (Title VII) have been unsuccessful. This letter is the notice required by §1601.25 of the Commission's Regulations, which provides that the Commission shall notify a Respondent in writing when it determines that further conciliation efforts would be futile or non-productive. No further efforts to conciliate this case will be made. Accordingly, we are at this time forwarding the case to the Department of Justice for litigation review. A determination should be forthcoming in the near future."

Although on September 7th 2022 the EEOC's Director of Oakland mentioned on the last paragraph of his letter (Exhibit # 4) that determination of Department of Justice (DOJ) for litigation review should be forthcoming in the **near future** but since **September 7th 2022** until **May 9th 2023** (in or around 9 months!!), I didn't receive anything back from Department of Justice although I reached DOJ out several times by several ways (emails, mailing letters, phone, fax and ...).

As you can see in Exhibit # 5, when I asked the EEOC to issue Notice of Right to Sue regarding charge # 555-2020-01235, EEOC let us know that since my charge was forwarded to the Department of Justice, I should contact the DOJ representative Karen Ferguson (karen.ferguson@usdoj.gov) to request my Notice of Right to Sue.

Finally, as you can see in Exhibit # 6, I kindly, respectfully and seriously gave the serious notice to Karen Ferguson, the Supervisory Civil Rights Analyst of U.S. Department of Justice in Civil Rights Division of Employment Litigation Section in Washington, D.C. that if she won't issue a Notice of Right to

Sue regarding **Charge # 555-2020-01235**, it will be violation of Department of Justice by **procrastination this case purposely and intentionally and it may lead to file federal lawsuit against DOJ.**

Besides that, as you can see in Exhibit # 7, I have reached out to Senator Kevin Kiley, U.S. Senator of California and asked him to contact to Department of Justice on my behalf and request them to issue a Notice of Right to Sue regarding **Charge # 555-2020-01235.**

Finally, as you can see in Exhibit # 2, on **May 9th 2023**, U.S. Department of Justice, Civil Rights Division (**Employment Litigation Section**) issued a **Notice of Right to sue** within **90 days** because of my specifically request for the Notice of Right to sue regarding **Charge # 555-2020-01235.**

As you can see in Exhibit # 2, U.S. Department of Justice, Civil Rights Division (Employment Litigation Section) mentioned the following:

“Dr. Sonia Sayyedalhoseini, because you filed the **charge # 555-2020-01235** with the Equal Employment Opportunity Commission, and **conciliation on that charge has failed**, and because **you have specifically requested this Notice**, you are hereby notified that you have the right to institute a civil action **under Title VII of the Civil Rights Act of 1964**, as amended, **42 U.S.C. Section 2000e et seq.**, against the Losrios Community College District, et all. as respondent.”

Although after in or around 2 years investigation (since September 2020 until August 2022), the EEOC mentioned on its Determination Letter regarding **Charge # 555-2020-01235** which released on **August 23rd 2022** (as you can see in Exhibit # 1) that **Losrios Community College District was known guilty in violation of Title VII of my Civil Rights** BUT this result of EEOC investigation came up only and only **1 week after that EEOC being served with my federal lawsuit against EEOC !!!!!Shame on EEOC.**

As you can see in Exhibit # 9, I have filed federal complaint against EEOC of Oakland and San Francisco on **August 8th 2022** in **U.S. Northern District Court of California** with **Court Case # 22-cv-03367-YGR** because during 2 years EEOC investigation period (since September 2020 until August 2022), the Federal law has been violated several times purposely, intentionally and consecutively through Law Misconduct which happened by some EEOC supervisors and investigators (**Bryan Hoss, Dana Johansson, Patrick Gheorghe and their Circle in EEOC**) during EEOC investigation.

It is a pity, shame and so sad to mention to this point that an independent agency such as EEOC (Equal Employment Opportunity Commission) which is responsible for federal investigation to determine discriminations, has some supervisors, officers and investigators who misconduct the investigation process as well as prosecution pathway several times, purposely, intentionally and consecutively **to cover Employer's violations (Losrios Community College District) against Employees**

(me as a victim) while one of the most important obligations of EEOC is protection of federal law, **NOT** supporting the violators.

It could be either for influence of my Employer (Losrios Community College District) over investigators (by Penetrating Pathway) to protect the son (Gregory McCormac, Dean of Biology Department) of Losrios' former Dean (Gregory McCormac's father) from justice punishment (Gregory McCormac's father was a former Dean in ARC who has many connections in Losrios Administration) **or** because of the investigator's discriminatory behaviors as well as Law Misconduct which has happened with any motivation from Losrios Community College District.

After we notified the agencies related to justice such as House Judiciary Committee, Senate Judiciary Committee, Headquarters of EEOC in Washington, D.C. regarding violations of **Bryan Hoss, Dana Johansson, Patrick Gheorghe and their Circle in EEOC**, so some of them became fired (Bryan Hoss and Dana Johansson) by EEOC Headquarters in Washington, D.C. but their circle who are still EEOC employees of Oakland (**Patrick Gheorghe and his circle in EEOC**), tried again and again to misconduct investigation process as well as prosecution pathway.

Finally, the severity and continuity of EEOC's violations led to filing complaint against EEOC by me. As you can see in Exhibit # 9, I have filed federal complaint against EEOC of Oakland and San Francisco on August 8th 2022 in U.S. Northern District Court of California with Court Case # 22-cv-03367-YGR.

The first strange, ridiculous, shameful, regrettable, weird and very worrying reaction of EEOC in response to my federal lawsuit against them was releasing the results of EEOC investigation for my first EEOC Charge (# 555-2020-01235) exactly 1 week after EEOC being served with my federal lawsuit against them!!!!!!!!!!!!!! Shame on Bryan Hoss, Dana Johansson, Patrick Gheorghe and their Circle in EEOC because of procrastinating this case so far.

Although the Honorable Judge of the District Court of California has dismissed my federal lawsuit against EEOC (Court Case # 22-cv-03367-YGR) by this excuse that the Federal agencies such as EEOC has immunity from lawsuit but as you can see in Exhibit # 10, I have appealed that decision in **Ninth Circuit Court of Appeal with Appeal Case # 23-15128**. Because I believe that the EEOC shall **NOT** take advantage of having immunity to do Law Misconduct during its investigation.

I have mentioned to all of the EEOC's violations during 2 years investigation in **Section VIII** of this statement. Although this complaint is against Losrios Community College District and Folsom Lake College (as one branch of Losrios Community College District) but by mentioning to EEOC's violations in Section VIII, I want to clarify this point that how much effort happened via Losrios to misconduct judicial process on its favor which is another violation of Losrios against me.

At the end of this part, I want to emphasize to this point that Losrios Community College, Gregory McCormac as Dean of Losrios, Niloofar Radgoudarzi as Lab Tech of Losrios, Mehdi Radgoudarzi as volunteer in Losrios and all other persons who are

involved in this violation, have to know that here is not land of king or queen and nobody can take advantage of his/her position, at all. Never ever.

Here is the United States of America, the land of liberty and justice for everyone for ever and ever. Some of us came to this country 400 years ago and some other came 4 years ago, but all of us are the same in front of justice. Finally, Light will overcome darkness.

Chief United States District Honorable Judge Kimberly J. Muller (KJM) and also **Magistrate Judge Deborah Barnes** know who I am and how much I have fought for justice as well as my husband's rights previously because as you can see in Exhibit # 11, I had filed lawsuit against USCIS, FBI and Department of Homeland Security in Eastern District Court with Case # 2:21-cv-1571-KJM-DB in 2021.

Under supervision and orders of Chief United States District Honorable Judge Kimberly J. Muller (KJM) and also Magistrate Judge Deborah Barnes, USCIS, FBI and Department of Homeland Security finally granted my husband's Citizenship because they had procrastinated his case base on disinformation, misinformation, false, fake and fabricated reports of Niloofar Radgoudarzi (FLC night shift lab tech) as well as her circle (Hengameh Hatami) but finally light overcame darkness and my husband's Citizenship was granted to him.

I have clarified all violations and crimes of Gregory McCormac in **Section III** of this statement. I also have explained all violations and crimes of Niloofar Radgoudarzi (Gregory McCormac's girlfriend) who is Lab Tech in Losrios in **Section VI** of this statement.

Besides that, I have mentioned all violations and crimes of Mehdi Radgoudarzi (Niloofar's father) who was volunteer in Losrios in **Section VII** of this statement.

***Section II) My Credibility: Clarification Regarding my Background**

Before everything, I want to introduce myself; **I am so honor and that's my pleasure to inform you that as you can see in Exhibit # 3, "President's Gold Award" granted to me and my spouse by President of United States who is highest headquarter of government, for our voluntary service in 2021.**

As you can see in the White House Letter in Exhibit # 3, the President of United States mentioned on the last paragraph of his letter this point that **on behalf of the American people, he extended his heartfelt appreciation to me for my voluntary leadership.**

It is my honor and pleasure to dedicate to serve to this country as well as this nation.

In addition to it, I was known as "National Volunteer Month" champion in Mercy Housing Federal evaluation on 2023 as you can see it in Exhibit # 3.

I have doctorate degree diploma in medicine (Doctor of Medicine, MD) and as you can see in Exhibit # 12, based on "**World Educational Service, WES**" evaluation, I passed all steps of U.S. equivalency evaluations so, my U.S. equivalency is "Doctor of Medicine" but I just use it for teaching and research. I am faculty member and university professor in college and university and I am busy with preparing assignments for teaching.

As you can see in Exhibit # 13, in addition to faculty member and university professor, I am also Editorial Board Member, EBM, of more than 40 Medical Journals in United States as well as all around the world.

As you can see in Exhibit # 14 every week, I review some research manuscripts which are submitted by scientists in journals to make decision about publication or not. This honorable position (Editorial Board Member) has been awarded and granted to me by the Office of the Journal for using my research knowledge and experience. That's my honor and pleasure to serve.

As you can see in Exhibit # 15, in addition to Editorial Board Member of Medical Journals, I am also Organizing Committee Member, OCM, in World Medical Conferences, International Symposium, Global Seminars to determine articles of scientists to present as poster presentation or speech performance in International Symposium and Global Conferences.

As you can see in Exhibit # 16, besides all the above positions, I am also Speaker in World Medical Conferences, International Symposium, Global Seminars such as Speaker in 2021 World Congress on Primary Health Care and Medicare.

Besides all of these, although I am so busy with all the above scientific activities but as you can see in Exhibit # 17, I am volunteering in 5 distinct organizations and served more than 5000 hours to all of them as volunteer. Those 5 organizations include:

*A) American Red Cross: since 2016 till current, more than 3500 hours voluntary work

*B) Senior Mercy Housing (American low-income seniors): since 2018 till current, more than 1500 hours voluntary work.

*C) UC-Davis hospital: since 2019 till current

*D) Shriner's group (serving to Shriner hospital): since 2019 till current

*E) Editorial board of Payam Javan magazine: since 2017 till current

The proof of all these volunteering activities and copy of the manager's business card of each one is attached in Exhibit # 17.

In addition to it, as you can see in Exhibit # 109 I write other kinds of articles such as:

- The Series of Article about Traditional Music of Iran
- The Series of Article about Cultural Costumes & National Ritual in Ancient Iran
- The Series of Article about Ancient Iranian Literature in Ferdosi's Shahnameh
- The Series of Article about Molana (Rumi) in Molana's Masnavi

Besides all of the above, as you can see in Exhibit # 108, I write medical articles about common diseases in Payam Javan Magazine monthly. I don't have any suggestions, prescription, recommendation, offer, advice in those articles. I just explain public information regarding common diseases such as pathophysiology of each disease, risk factors, causes, signs & symptoms and side effects.

***Section III** Violations of Employer (Losrios Community College District, LRCCD & Folsom Lake College (as one branch of Losrios Community College District))

This **section III** includes all events, evidences, proofs, information, clarification and explanation which proves and establishes that the law strongly violated by Losrios Community College District and as you can see in **Exhibit # 1**, finally those events led to the results of EEOC investigation which came up on **August 23rd 2022** and **Losrios was known guilty in violation of Title VII of my Civil Rights** as you can see in **Exhibit # 1**.

The result of EEOC investigation proves this point that **all the accusations, misinformation and disinformation** on all 3 Losrios Position Statements are **False, Fake and Fabricated** claims against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and

You can see those accusations in all 3 Losrios Position Statements in Exhibit # 57, Exhibit # 58 and Exhibit # 59. The Losrios position statement regarding this **EEOC charge # 555-2020-01235** has been placed in Exhibit # 57.

As you can see in **Exhibit # 1**, the results of EEOC investigation came up on **August 23rd 2022** and **Losrios (my employer) was known guilty in violation of Title VII of my Civil Rights.**

This result of EEOC investigation came up only and only **1 week after that EEOC being served with my federal lawsuit against EEOC!!!!!!!!!!!!!!:-))** because as you can see in **Exhibit # 9** I have filed federal complaint against EEOC of Oakland and San Francisco on **August 8th 2022** in **U.S. Northern District Court of California** with **Court Case # 22-cv-03367-YGR.**

First of all, before I start to clarify Losrios violations which led to the results of EEOC investigation, I want to emphasize this point that the **irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying accusations** in all 3 responses of Losrios Community College, proves this point that Losrios counted on Dana Johansson, Bryan Hoss and **Patrick Gheorghe's circle** as EEOC employees and investigators to Misconduct the Law. Shame on all of them.

We didn't expect anything else from Losrios but it is so pity, sad and shameful that some EEOC supervisors & investigators committed to violate the federal law with Losrios while one of the most important obligations of EEOC is protection of federal law, **NOT** supporting the violators.

The Federal law has been violated several times purposely, intentionally and consecutively through Law Misconduct which has happened by some EEOC supervisors and investigators (Bryan Hoss, Dana Johansson and their Circle) during EEOC investigation.

After we notified the agencies related to justice such as House Judiciary Committee, Senate Judiciary Committee, Headquarters of EEOC in Washington, D.C. regarding Bryan Hoss and Dana Johansson's Violations, so they became fired because of Law Misconduct which has happened by them during investigation Process and they are not EEOC employees anymore, but their circle who are still EEOC employees, tried again to misconduct investigation process as well as prosecution pathway.

It is a pity, shame and so sad to mention to this point that an independent agency such as EEOC (Equal Employment Opportunity Commission) which is responsible for investigation to determine discriminations, has some supervisors, Officers and investigators who misconduct the investigation process as well as prosecution pathway several times, purposely, intentionally and consecutively to cover Employer's violations (Losrios Community College District) against Employees (me as a victim).

It could be either for influence of those Employers (Losrios) over investigators (by Penetrating Pathway) to protect the son of their former Dean from justice punishment (Gregory McCormac's father was a former Dean in ARC who has many connections in Losrios Administration) or because of the investigator's discriminatory behaviors as well as Law Misconduct which has happened with any motivation from Losrios.

Finally, the severity and continuity of EEOC's violations led to filing complaint against EEOC by me. As you can see in Exhibit # 9, I have filed federal complaint against EEOC of Oakland and San Francisco on August 8th 2022 in U.S. Northern District Court of California with Court Case # 22-cv-03367-YGR.

The first strange, ridiculous, shameful, regrettable, weird and very worrying reaction of EEOC in response to my federal lawsuit against them was releasing the results of EEOC investigation for my first charge exactly 1 week after EEOC being served with my federal lawsuit against them!!!!!!!!!!!!:-)) Shame on Bryan Hoss and Dana Johansson's Circle because of procrastinating this case so far.

On the results of EEOC investigation of my first charge which came up on August 23rd 2022, **Losrios was known guilty in violation of Title VII of my Civil Rights on that.** You can see the Letter of Determination regarding my first charge # 555-2020-01235 on Exhibit # 1.

The results of EEOC investigation of my charge # 555-2020-01235 **proves** and

establishes this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against Losrios in EEOC, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation** that they brought in all their Position Statements.

This results also **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements are **False, Fake** and **Fabricated** claims/reports against us.

Some of those accusations include: **Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and ...**

You can see those accusations in all 3 Losrios Position Statements in Exhibit # 57, Exhibit # 58 and Exhibit # 59. The Losrios position statement regarding this **EEOC charge # 555-2020-01235** has been placed in Exhibit # 57.

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations** in **my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** as well.

Continuance of Losrios Violations which is happening currently could be the result of Bryan Hoss, Dana Johansson & Patrick Gheorghe's strange and very worrying actions as EEOC Supervisors/investigators.

It is also another evidence which proves this point as well that the excuse of **Monica Pactol, Vice President of FLC, regarding course reduction in COVID-19 situation that affected on our termination in May 2020 (on Exhibit # 18), was also another excuse to cover and hide their retaliation and violations against me.**

Continuance of Losrios Violations which is happening currently also proves and establishes this point completely that all Losrios administrators' excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse as you can see in Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse as you can see in Exhibit # 19) were only excuses to cover and hide their retaliation and violations against me.

When Bryan Hoss, Dana Johansson and Patrick Gheorghe as EEOC Directors/investigators had strange and very worrying actions and also, they

have Law Misconduct several times purposely and intentionally, so who can stop Losrios' violations????!!

Losrios' Violations includes:

1st Losrios's Violation: Sexual Harassment Against me by Gregory McCormac (Dean of Biology Department) Several Times.

2nd Losrios' Violation: Niloofar Radgoudarzi's Retaliation (Losrios' Lab Tech who manipulated and provoked his boyfriend (Gregory McCormac, dean of biology department) against me (Niloofar is Gregory McCormac's Girlfriend)

3rd Losrios' Violation: Mehdi Radgoudarzi's Retaliation (Losrios' Volunteer)

4th Losrios' Violation: Laying me off from my Employment on May 2020 in Retaliation for Engaging in Protected Activity, in Violation of Title VII of the Civil Rights Act of 1964 as Amended (Title VII) base on the Results of EEOC investigation that came up on **August 23rd 2022** and **Losrios was known guilty in violation of Title VII of my Civil Rights** as you can see in Exhibit # 1.

5th Losrios' Violation: Ignoring our Several Prior Notifications by Headquarters of Losrios and FLC on Summer 2020 which was regarding 3rd Violations of Gregory McCormac against us about Hiring New Adjunct Faculty for Fall 2020 instead of us (Dr. Heather Roberts) by Gregory McCormac (Dean of Science)

6th Losrios' Violation: Hiring New Adjunct Faculty instead of us for Fall 2020 (Dr. Heather Roberts)

7th Losrios' Violation: Ignoring our Several Protest to Hiring New Adjunct Faculty instead of us for Fall 2020 by Headquarters of Losrios and FLC on August, September and October 2020 until our New Complaints Against Losrios which was Filed on 09-10-2020 with Charge # 555-2020-01235 was Transferred to EEOC Investigation Department after we Rejected the Mediation of EEOC.

8th Losrios' Violation: Cut off our Access to our Outlook Emails, Proofs and Evidences in or around February 2021

9th Losrios' Violation: Hiring 2 More New Adjunct Faculties instead of us for Spring 2022 for in Person Classes (Rahman Ferdosi & Abigail Analeigh), They Have Proved this Point that All Their Excuses regarding Course Reduction in COVID-19 Situation (Monica Pactol's Excuse, Exhibit # 18 who is FLC Vice President) or Dr. Heather Roberts' Online Experience in Teaching (Peter Khange's Excuse, Exhibit # 19 who is Director of Human Resources in Losrios) were only Excuses to Cover Their Retaliation & Violations against us.

10th Losrios' Violation: All Losrios's Accusations, Misinformation, Disinformation, Dishonesty, Derailment from the Main Subject and All the Other False, Fake and Fabricated Claims in All 3 Losrios Position Statements in Response to EEOC to Distort the Reality during the Investigation (We Rejected and Rebutted All of Them

One by One, Line by Line with our Hereinafter Charge and Finally it Led to the Results of EEOC Investigation that Came up on **August 23rd 2022** and **Losrios was Known Guilty in Violation of Title VII of my Civil Rights** as You Can See in Exhibit # 1).

11th Losrios' Violation: Law Misconduct during EEOC Investigation by the Influence of Losrios over Investigators (by Penetrating Pathway) to Protect the Son of Their Former Dean from Justice Punishment (Gregory McCormac's Father was a Former Dean in ARC who Has Many Connections in Losrios Administration).

1st Losrios's Violation: Sexual Harassment Against me by Gregory McCormac (Dean of Biology Department) Several Times.

First of all, It is a pity, shame and so sad to mention to this point that although one of the main reason of existence a Dean for each department is to provide a safe educational place for students as well as safe workplace for colleagues and faculties but the Dean of Science Department in FLC who is Gregory McCormac (son of Losrios' former Dean) is guilty because he started emotional relationship with his previous student (Niloofar Radgoudarzi), transferring his girlfriend to his workplace, became provoked by Niloofar's manipulation against 2 faculties, sexual harassment of one faculty (Sonia Sayyedalhoseini), retaliation against the husband (Saeid) of faculty (Sonia) who was sexually harassed by Gregory McCormac in response to Sonia's rejection.

Worse than Gregory McCormac's behavior, is Losrios Community College District's Actions against victims of Gregory McCormac's violations and discrimination (Saeid and Sonia).

The Losrios & FLC administration who participated in these obvious violations include:

King Brian (Chancellor of Losrios),

Jacob Knapp (Leadership Line Member of Losrios)

Peter Khang (Director of Human Resource of losrios)

Whitney Yamamura [President of Folsom Lake College (as one branch of Losrios Community College District)]

Monica Pactol (Vice President of FLC & Direct Supervisor of Greg)

Gregory McCormac (Dean of Science in FLC)

Niloofar Radgoudarzi (FLC Lab Tech who is Gregory's girlfriend and she was Gregory's former student)

Mehdi Radgoudarzi (FLC Volunteer who is Niloofar's father)

Molly Senecal (Interim Dean of Student Success, Title IX Officer in FLC)

So, most of the FLC and Losrios Administration which mentioned their names and positions above, participated in this violation because Gregory McCormac is son of their former Dean (Gregory McCormac's father was their former Dean in ARC and has lots of connections with FLC and Losrios administration members), so they wanted to protect the son of their former Dean.

I had participated in a protected activity and had filed complaint against dean of FLC in our union as well as EEOC on spring 2020, but 1 month after EEOC gave me lawsuit letter against Losrios and also couple days after the result of Losrios internal biased investigation came up, I was laid off by Gregory McCormac without any explanation **while I was starting to file the lawsuit against Losrios BUT because I was laid off by Gregory Retaliation in May 2020, so I couldn't afford to pay the lawyer anymore and my lawsuit filed against Losrios was discounted.**

I was hired by the Respondent in or around August 8, 2018. My job title upon hire was Adjunct Faculty and Professor in Human Anatomy and Physiology. My immediate supervisor was Gregory McCormac, Dean.

On six occasions, I was subjected to sexual harassment by Greg McCormac, Dean of the Biology Department. More specifically, on **October 29, 2018, October 23, 2019, and November 5, 2019**, Mr. McCormac made an unwanted sexual advance to me.

I declined his sexual advances each time. In or around January 2019, I requested to be transferred to another location from FLC main campus in Folsom to FLC Eldorado center, while as you can see in Exhibit # 20, since 2015 I live in Folsom and as you can see in Exhibit # 21, according to my availability form, FLC main campus was my priority always because on that time I didn't have car.

After Gregory McCormac's sexual harassment, I no longer felt comfortable working at the same facility as Mr. McCormac in main campus because of the sexual harassment. My transfer request was approved. On two more occasions in late 2019, Mr. McCormac asked me whether I have considered his advances.

As I have told to Micheal Hourani Officer of EEOC in my primary charge # 555-2020-00834 on 03/10/2020 and also, I've mentioned in my statement to internal investigator of Losrios (Megan) and I've explained to her in person on meeting date:

I had a meeting with McCormac to discuss his observation on my performance as a 1st performance reviewer on 10/29/18. During meeting he gave me some suggestion and I accepted all of them. At the end, when I wanted to leave his room, he told me that he has almost 20 years experiences of teaching and he has lots of ideas and suggestions to share with me but it needs more communication to make everything easier.

I responded that: "Of course, the goal of today's meeting was this point to share your

suggestions with me. So, feel free to give me all your advice”.

But Gregory McCormac said: “No, I meant **OUTSIDE** the college we should communicate more.”

I told him: “Yes, Saeid (my husband) and I, want to invite you and your wife for dinner to our house and cook Persian food.”

Gregory told me: “No, I meant that just you and I **WITHOUT** Saeid or anybody else, outside the college should be alone to communicate more.”

During McCormac was talking to me on the meeting, he was making hand and finger in a gesture of a sexual nature by forming a circle with one hand and putting his index finger off his other hand in the circle.

By doing this he was making facial expressions which raised eyebrows in a way that suggested something sexual and tried to touch my hand even after I denied his request. I was really shocked and felt dry mouth and didn't find any word to say and it was very offensive and it hurts my feelings and the humiliation feeling was so bothering.

Gregory McCormac realized my angriness and told me: “No worries we can talk about it more lately, now you should go to your class and we will meet later on”.

I was **FORCED** to ask for transferring from FLC to EDC because of Gregory's behavior. I wanted to protect myself from further unwanted sexual harassment by Gregory McCormac. So, seeking a transfer from FLC main campus to EDC was **NOT** on my desire.

Firstly, as you can see in Exhibit # 20, since 2015 till currently, we live in Folsom, so FLC main campus which is located in Folsom, was my first choice because we didn't have car on that time and also as I have mentioned it in my statement to Megan (internal investigator), I had told Greg that if he doesn't accept my transfer to EDC, I would quit teaching in Losrios, because at first Gregory McCormac didn't want to accept my transfer and persisted to keep me in Main Campus in Folsom.

Secondly, as you can see in Exhibit # 21, I stated on step 1 of my availability form (section 1.6) that my first choice is FLC main campus, then FLC Rancho Cordova and last choice was FLC Eldorado. As you can see in step 2 of availability form, my physical address is written Folsom.

Thirdly, as you can see in Exhibit # 22 (google map website), the distance between my house and FLC main campus is only 9 minutes but the distance between my house and EDC is 31 minutes, so it is obvious that for me it was completely better to stay at FLC main campus instead of EDC.

Fourthly, I emphasized again that I requested to transfer to EDC because I wanted to protect myself from further harassment by Greg so, although our home was in Folsom and we didn't have car to go to EDC [which is located in Placerville (too far from our home)], I requested for transfer. The documents on Exhibit # 20 is the best reference that proves my physical address has been in Folsom since 2015 till now.

During the biased Losrios investigation which had happened to protect the son of their former Dean (Gregory McCormac's father was ARC former Dean for many years), Gregory McCormac denied his inappropriate request and his denial was predictable. It is obvious that the harasser denies sexual harassment.

As you can see in the **Result of Losrios Biased Investigation regarding Sonia's Complaint**, in Exhibit # 23, in Allegation # 1 of Losrios Investigation, Line 3, Megan (Losrios Investigator) has mentioned:

"McCormac acknowledged that he likely said that the two of you should communicate more, but for legitimate **business reasons**. You were a new Adjunct Professor with short teaching experience at the time, and Mr. McCormac's suggestion to communicate was to help you become a better teacher."

While in Losrios position statement in Underline number # 5, they've mentioned that:

"McCormac has never made comments about meeting privately outside the college."

As I mentioned in Underline number # 4 (Opposition to Losrios Position Statement which is in Part 2 of Section B of this statement), If Megan did our main request regarding to check Greg's office camera in specific days and times which we gave to her, Megan Could understand that Greg which has affair with Niloofar (night shift lab tech in FLC who was his former student), is not a credible person, neither as a dean nor as a teacher.

Because in each department, the philosophy of having dean is to protect faculties, students and colleagues from any harassment or discrimination.

He asked her to reconsider his advances five other times (which wasn't in that meeting), and each time he made the same comments and gestures and he said there were many experiences that he wanted to teach her, this was meant in a sexual way.

The most recent incident was in or around late 2019, when she went to the main campus to pick up her paycheck. Gregory McCormac saw her accidentally and he repeated his inappropriate request. In or around January 2020, she became overwhelmed from his several behaviors.

He asked me to reconsider his advances five other times (which wasn't in that meeting), and each time he made the same comments and gestures and he said there were many experiences that he wanted to teach me, this was meant in a sexual way.

The most recent incident was in or around late 2019, when I went to the main campus to pick up my paycheck. Gregory McCormac saw me accidentally and he repeated his inappropriate request. In or around January 2020, I became overwhelmed from his

several behaviors.

As you can see in **My Psychiatrist's Notes and Report** in Exhibit # 24, I had shared Gregory McCormac's sexual harassment with psychiatrist who started to psychotherapy for me since the first incident (10/29/2018) till now.

The psychiatrist, seriously ordered to me to talk to Saeid about what had happened to me because Psychiatrist was so worried about my health.

I did not want to talk about these incidents with anybody else because she thought that Gregory McCormac's behavior is my fault. So, I hesitated to tell Saeid. The only person whom I talked to was my psychiatrist.

My Psychiatrist's Notes and Report which my psychiatrist sent to me on May 2020 because of our own lawyer's Request to File lawsuit Against Losrios by the EEOC Lawsuit Letter, is attached in Exhibit # 24, **BUT because we were laid off by Gregory McCormac Retaliation in May 2020 so we couldn't afford to pay the lawyer anymore and our lawsuit filed against Losrios was discontinued.**

Saeid and I, filed an internal complaint against Gregory McCormac in Losrios through union in or around February 2020.

Saeid (my husband) filed a complaint against Dean McCormac for retaliation **NOT ONLY** as a result of my denial to meet privately with Dean, but also because of targeting Saeid based on Greg's girlfriend manipulation. (Niloofar Radgoudarzi, night shift lab tech in FLC main campus).

I believe Gregory McCormac, targeted my husband, Professor Dr. Seyed Saeid Zamanieh Shahri, because of TWO reasons (not only one):

- 1) I had rejected his sexual harassment in 6 occasions as I have clarified above with details.**
- 2) We had rejected all illegal and unethical requests of Niloofar Radgoudarzi, night shift lab tech of FLC who stated she is Greg's Girlfriend. Niloofar Radgoudarzi was former Greg's student in ARC and when Greg became Dean in FLC in 2018, he hired her in spring 2019 as a night shift lab tech of FLC which had flexible schedule hours during week!!!**

***The First Time That My Husband, Professor Dr. Seyed Saeid Zamanieh Shahri, Became Targeted by Greg (11-18-19):**

As you can see in Exhibit # 25 (Emails # 4 & 5), on 11/12/19, Gregory McCormac asked Saeid to have meeting with him regarding student **CONCERNS** while fortunately, Saeid got student survey couple days before that. This came up exactly 2 days after Niloofar (night shift lab tech who told us that she is Greg's girlfriend) threatened us to fire us by her influence over Greg which was after we had rejected all her illegal and unethical requests.

Fortunately, Saeid has recorded Greg's voice during meeting because couple days before that, Niloofar threatened us to fire us by her influence over Greg. That's why Saeid recorded his voice in meeting, as well as he got student survey.

As you can see in Exhibit # 26 (Email # 13) (which includes Saeid's concerns regarding the meeting that he shared with Gregory McCormac in January 2020 when Saeid became overwhelmed):

On 11/18/19, Greg and Saeid, had meeting about student concern. Before starting the meeting when Saeid was in the waiting room, Greg McCormac told him in front of me that he should wait more because Greg received many complains about Saeid and his class so, he wanted to collect all of them.

BUT during the meeting before he started the meeting when Saeid placed student surveys on Greg's table, he became shocked and he changed his comment from **SO MANY complaints** into just **TWO students concerns** and told Saeid that just two students had concerns about some things. The voice of Gregory McCormac during this meeting is available.

The STRANGEST thing was that although Saeid & Greg had reviewed 2 times all students survey together during the meeting, **BUT** they could **NOT** find even one of those 2 students' **CONCERNS** that Greg had mentioned in the beginning of the meeting. Also, at the end of their meeting Greg talked about Niloofar that it didn't relate to that meeting at all.

As you can see in Exhibit # 27 (Email # 5), although everything was clear for Saeid that students' concerns **was just excuse to target him** and students' survey protected Saeid **BUT** Saeid preferred to pretend that he believed Greg's concerns to keep peace in his workplace.

***The Second Time That My Husband, Professor Dr. Seyed Saeid Zamanieh Shahri, Became Targeted by Greg (01-09-2020):**

As you can see in Exhibit # 28 (Email # 6), on January 9, 2020. Mr. McCormac tried to change Saeid's schedule even though Professor Rogers (on Exhibit # 29) and Saeid told Greg in advance in several times that their plan for the spring semester 2020 was team teaching.

As you can see in Exhibit # 30 (Email # 7), Saeid refused Greg's offer because it was illegal to change the class schedule one week prior to a new semester beginning.

***The Third Time That My Husband, Professor Dr. Seyed Saeid Zamanieh Shahri, Became Targeted by Greg (01-14-2020):**

As you can see in Exhibit # 31, until January 13th 2020, Saeid's class schedule was on **only** his name but as you can see in Exhibit # 32, in or around January 14, 2020,

Saeid's class schedule was changed on the website, and another professor was added to Saeid's class lecture besides him. We believe this was a retaliatory action by Dean.

Saeid (my husband) has been subjected/targeted to harassment and discriminatory terms/conditions of employment by Dean of Biology Gregory McCormac because of both my rejection about Greg's harassment as well as Niloofar Radgoudarzi influence (Greg's girlfriend which was the FLC night shift Lab tech).

As I mentioned above, on 11/18/2019, Mr. McCormac attempted to discharge/fire Saeid after a false/fabricated student concern was reported, and this occurred days after we were threatened by Niloofar who threatened us to fire us by her influence over Greg.

I believe Mr. McCormac has subjected Saeid (my husband) to retaliation because 2 main reasons. **The first reason** is because of we refused to engage in illegal and unethical behavior/request to assist his girlfriend, Niloofar Radgoudarzi. When we refused to assist her in providing false references, among other unethical acts, she threatened use her influence as the Dean's girlfriend to subject us to an adverse employment action. Additionally, she threatened to have us discharged if we disclosed her relationship with the Dean.

The second reason is because of Gregory McCormac made sexual advances to me, Dr. Sonia Sayyedalhoseini, on several occasions as well which I rejected him. I believe he is also targeting my husband in retaliation for Saeid's association with me (in addition to the influence of Niloofar Radgoudarzi).

As you can see in Exhibit # 26 (Email # 13), when Saeid became overwhelmed in 15th January 2020 (15 days **BEFORE** that he scheduled performance review for him), Saeid explained all the above matters to Gregory McCormac on 01-15-20 and he placed Chair of department, Professor Rogers on Cc and Saeid asked Greg to clarify those paradox matters in Email # 13, **BUT Greg did NOT answer to this email AT ALL.**

As you can see in Exhibit # 33, we also filed the same complaint with EEOC with the following charge numbers:

Primary EEOC charge of Saeid (# 555-2020-00833 on 03/19/20 with M.Hourani).

Primary EEOC charge of Sonia (# 555-2020-00834 on 03/10/20 with M.Hourani).

Finally, I made my decision, so in January 2020, I complained about sexual harassment to the Respondent's Human Resources Department and to my union. My husband Dr. Seyed Saeid Zamanieh Shahri filed a distinct complaint against Gregory because my husband has been subjected/targeted to harassment and discriminatory terms/conditions of employment by Dean of Biology Gregory McCormac because of both my rejection about Greg's harassment as well as Niloofar Radgoudarzi's influence (Greg's girlfriend which was the FLC night shift Lab tech). An internal investigation ensued. Subsequently, as you can see in Exhibit # 33, on or about March 11, 2020, I filed EEOC Chg. 555-2020-00834C, Sonia Sayyedalhoseini v. Los Rios

Community College District through EEOC.

As you can see in Exhibit # 23, on or about May 01, 2020, the Respondent completed its internal investigation which was to protect the son of former Dean (Gregory McCormac's father was the former Dean in Losrios) and found that my allegations could not be substantiated.

2nd Losrios' Violation: Niloofar Radgoudarzi's Retaliation (Losrios' Lab Tech who manipulated and provoked his boyfriend (Gregory McCormac, dean of biology department) against me (Niloofar is Gregory McCormac's Girlfriend)

Niloofar Radgoudarzi is FLC Lab Tech. She is girlfriend of Gregory McCormac (Dean of biology department in FLC). Niloofar was Greg's student when he taught biology in American River College (ARC).

As you can see in the "Table of Contents" which has been attached to the beginning of this complaint, I have clarified all Niloofar Radgoudarzi's Retaliation, violations, crimes, illegal and unethical behaviors in the **Section VI** of this statement . Please read it line by line and one by one.

3rd Losrios' Violation: Mehdi Radgoudarzi's Retaliation (Losrios' Volunteer who is Niloofar's father)

Mehdi Radgoudarzi was Losrios' volunteer. As you can see in Exhibit # 112, he has mentioned in page # 2 of his Resume/CV that he is volunteer assistant professor in Human Anatomy, Physiology & Cadaver Dissection Class in Folsom Lake College.

He also mentioned to my name (Sonia Sayyedalhoseini) as well as my husband's name in the bottom of page # 2 and top of page # 3 of his Resume/CV in Exhibit # 112.

I have received his Resume/CV by his email (as you can see it in Exhibit # 113) because I helped him to become hired in CNSU (California Northstate University) College of Health as professor.

Mehdi Radgoudarzi had plan to get professor position. So, that's why Mehdi Radgoudarzi had started volunteering in both my classes and my husband's class (Dr. Seyed Saeid, Zamanieh Shahri) since Fall 2019 to become familiar with teaching methods and performance.

As you can see in the "Table of Contents" which has been attached to the beginning of this complaint, I have clarified all Mehdi Radgoudarzi's Retaliation, violations, crimes, illegal and unethical behaviors in the **Section VII** of this statement. Please read it line by line and one by one.

4th Losrios's Violation: Laying me off from my Employment on May 2020 in Retaliation for Engaging in Protected Activity, in Violation of Title VII of the Civil Rights Act of 1964 as Amended (Title VII) base on the Results of EEOC investigation that came up on August 23rd 2022 and Losrios was known guilty in violation of Title VII of my Civil Rights as you can see in Exhibit # 1.

As you can see in Exhibit # 34, on or about May 21, 2020, I was laid off/terminated by Gregory McCormac. Gregory McCormac didn't give me any reason for my termination. I subsequently followed the reason of my laid off up with Monica Pactol (Vice President of FLC) and as you can see in Exhibit # 18 (email # 48), finally she brought this excuse that **COURSE REDUCTION** regarding to COVID-19 situation affected on both of us for Fall 2020 assignment.

Losrios laid me off while I was starting to file the lawsuit against Losrios **but because I was laid off by Gregory's retaliation in May 2020, I couldn't afford to pay the lawyer fee anymore and our lawsuit complaint against Losrios was discounted.**

As you can see in Exhibit # 1, the results of EEOC investigation came up on **August 23rd 2022 and Losrios (my employer) was known guilty in violation of Title VII of my Civil Rights.**

This result of EEOC investigation came up only and only **1 week after that EEOC being served with my federal lawsuit against EEOC!!!!!!!!!!!!!!:-)** because as you can see in Exhibit # 9, I have filed federal complaint against EEOC of Oakland and San Francisco on August 8th 2022 in **U.S. Northern District Court of California** with **Court Case # 22-cv-03367-YGR.**

5th Losrios's Violation: Ignoring our Several Prior Notifications by Headquarters of Losrios and FLC on Summer 2020 which was regarding 3rd Violations of Gregory McCormac against us about Hiring New Adjunct Faculty for Fall 2020 instead of us (Dr. Heather Roberts) by Gregory McCormac (Dean of Science)

As you can see in Exhibit # 18, although Monica Pactol, the Vice President of FLC, had brought this excuse that **COURSE REDUCTION** which was Related to COVID-19 Situation affected on our termination but suddenly the FLC class schedule website changed to TBA.

In FLC Biology Department whenever Gregory McCormac wanted to hire a new professor, the FLC class schedule website changed to TBA. So, it was a sign for us that Gregory McCormac started to hire new adjunct faculty instead of us which was retaliation against us.

We realized that Course Reduction in COVID-19 Situation (Monica Pactol's Excuse who is FLC Vice President) was only a cover to hide their retaliation against us because base on FLC class schedule website, in our department, whenever Gregory

McCormac wanted to hire new adjunct faculty, in the FLC class schedule website TBA appeared instead of the Professor's name for biology courses. This change happened on Summer 2020 in FLC class schedule website for the the course we taught before. So, we realized that Gregory McCormac had planned to hire new adjunct faculty instead of us.

As you can see in Exhibit # 35 (Email # 50 to Email # 57) since May 2020 till August 2020, **we had notified in ADVANCE all FLC and Losrios Headquarters who involved in our cases, several times that Gregory McCormac wants to hire NEW adjunct faculty instead of us for Fall 2020 and we mentioned to them that it is obvious violation against us because we filed complaint against him, BUT they did NOT stop him.**

As you can see in Exhibit # 35 (Email # 50 to Email # 57) all of the FLC and Losrios Headquarters were in the Cc of those emails.

In our first prior notification regarding hiring new adjunct faculty, only Robert Perrone (executive director of union) and also Peter Khang (director of human resource of Losrios), followed our several notifications by FLC administration before hiring NEW adjunct faculty happening (NOT AFTER that).

As you can see in Exhibit # 36 (Email # 51, 53 & 55) both Peter Khange and Robert Perrone told us that FLC administration let them know that **NEW** adjunct faculty hiring won't happen and from the courses which was available, one of them gave to un-preference adjunct faculty (who was Kamran Shoaai) and the rest of them, will give to **full-time faculty**.

As you can see in Exhibit # 37 (Email # 55) Peter Khang emphasized that he would **monitor** FLC administration to prevent the violation, but he did **NOT** because as I clarify in the next section (4th Losrios violations), hiring new adjunct faculty for Fall 2020 instead of us (Dr. Heather Roberts) finally happened as we predicted it before.

Besides all the above, as you can see in Exhibit # 38 (Email # 54 & 55), Peter Khang (the Director of Human Resources in Losrios) told us on May 28th & 29th 2020 that he personally talked to Monica (Vice President of FLC who is direct supervisor of Gregory McCormac), and Monica let him know that **NEW** adjunct faculty hiring won't happen and from the courses which were available, one was given to un-preferenced adjunct faculty (who was Kamran Shoaai) and the rest, will be given to **full-time** faculties (FT).

As you can see in Exhibit # 37 (Email # 55), Peter Khang had emphasized that he would **MONITOR** FLC administration to prevent the violation which we mentioned to him before, but he did **NOT** and finally the obvious violation (hiring **NEW** adjunct instead of us: Dr. Heather Roberts) happened on August 2020, while we already had notified losrios administration about this violation, **FOUR MONTHS** in advance (since May 2020 till Aug 2020, Email # 50 to # 57 in Exhibit # 35).

6th Losrios's Violation: Hiring New Adjunct Faculty instead of us for Fall 2020 (Dr. Heather Roberts)

As you can see in Exhibit # 39, in or around August 2020, I came to learn that the courses that I was teaching, remain available and the Respondent hired a **NEW** professor (**Dr. Heather Roberts**) instead of us for fall 2020 to teach the same course that I taught before, while in summer 2020 when we protest to them about our termination immediately after our complaints, they brought this excuse that they have course reduction for fall 2020 but they hired new adjunct faculty for fall 2020 for the same course that we taught before.

This obvious violation (hiring **new** adjunct faculty; Dr. Heather Roberts) happened while as you can see in Exhibit # 35 (Email # 50 to Email # 57) since May 2020 till August 2020, **we had notified in ADVANCE all FLC and Losrios Headquarters who involved in our cases, several times that Gregory McCormac wants to hire NEW adjunct faculty instead of us for Fall 2020 and we mentioned to them that it is obvious violation against us because we filed complaint against him, BUT they did NOT stop him.**

As you can see in Exhibit # 40 (Email # 63), Peter Khange accepted hiring **NEW** adjunct faculty (Dr. Heather Roberts) instead of us, but he brought this excuse that **NEW** adjunct faculty hiring instead of us, has happened according to Dr. Heather Robert's experiences in online teaching, while:

Firstly, Peter Khange's excuse was **contrary** to what he stated on May 28, 2020: "adjunct faculty hiring will not happen" as you can see it in Exhibit # 41 (Email # 53).

In addition to it, as you can see in Exhibit # 36 (Email # 51, 53 & 55) both Peter Khange and Robert Perrone told us that FLC administration let them know that **NEW** adjunct faculty hiring won't happen and from the courses which was available, one of them gave to un-preference adjunct faculty (who was Kamran Shoaei) and the rest of them, will give to **full-time faculty**.

As you can see in Exhibit # 37 (Email # 55) Peter Khang emphasized that he would **monitor** FLC administration to prevent the violation, but he did **NOT** because as you can see in Exhibit # 38 (Email # 54 & 55), Peter Khang told us on May 28th & 29th 2020 that he personally talked to Monica (Vice President of FLC who is direct supervisor of Gregory McCormac), and Monica let him know that **NEW** adjunct faculty hiring won't happen and from the courses which were available, one was given to un-preferenced adjunct faculty (who was Kamran Shoaei) and the rest, will be given to **full-time** faculties (FT).

Secondly, Peter Khange's excuse was **contrary** to what Monica Pactol (Vice President of FLC) stated on May 14, 2020 that Monica explained to us which **COURSE REDUCTION** affected on us **NOT** online teaching experience that you can see it in Exhibit # 18 (Email # 48).

Thirdly, according to students' feedback and our survey that we got from the students at the end of each semester through emails, prior my laid off, my performance was satisfactory in both online and on ground but in or around February 2021, Losrios cut off our access to our emails, proof, evidence, canvas material, emails of outlook, students' feedback and our survey that we got from the students at the end of each semester through emails.

Fourthly, **NONE** of the adjunct faculties in Human Anatomy & Physiology department in FLC (such as Michelle Lee, Osario or Kamran Shoaeci) had **online teaching experience** more than us.

As I have mentioned it before and you can see in Exhibit # 35 (Email # 50 to Email # 57) since May 2020 till August 2020, we had notified all FLC and Losrios administration who involved in our cases, several times **in ADVANCE** that, Gregory McCormac wants to hire **NEW** adjunct faculty instead of us and we mentioned to them that it is obvious violation against us because we filed complaint against him, **BUT** they did **NOT** stop him.

In our first notification regarding hiring new adjunct faculty, only **Robert Perrone** (executive director of union) and also **Peter Khang** (director of human resource of Losrios), followed our several notifications by FLC administration **before** hiring **NEW** adjunct faculty happening (**NOT AFTER** that).

7th Losrios's Violation: Ignoring our Several Protest to Hiring New Adjunct Faculty instead of us for Fall 2020 by Headquarters of Losrios and FLC on August, September and October 2020 until our New Complaints Against Losrios which was Filed on 09-10-2020 was Transferred to EEOC Investigation Department after we Rejected the Mediation of EEOC.

As you can see in Exhibit # 42 (Email # 58 to 68) **after** hiring **NEW** adjunct faculty by Gregory McCormac which happened on August 2020, we protested again and again several times to all FLC and Losrios administration who involved in our cases, that this obvious violation which we already had notified them before, finally has happened in front of their eyes while we had notified them about this violation **BEFORE** and although they could stop it, but they did **NOT**.

None of Losrios administration responded to us until we rejected EEOC mediation, then investigation by EEOC began. You can find proof of above events, our notifications and our protests to Losrios and FLC administration who involved in our cases, **BEFOR** and **AFTER** happening this obvious violation, in the following protocol:

- 1) In Exhibit # 35, Email # 50 to # 57, related to our notifications to FLC and Losrios administration **BEFORE** hiring **NEW** adjunct faculty instead of us.
- 2) In Exhibit # 42, Email # 58 to # 68, related to our protest to Losrios administration's silence **AFTER** hiring **NEW** adjunct faculty instead of us.

We had also placed most of the FLC and Losrios administration members who were involved in our cases in cc part of most emails such as:

King Brian (Chancellor of Losrios Community College District)

Jacob Knapp (Leadership Line Member of Losrios Community College District)

Peter Khang (Director of Human Resource of losrios Community College District)

Whitney Yamamura (President of Folsom Lake College (as one branch of Losrios Community College District))

Monica Pactol (Vice President of FLC & Direct Supervisor of Greg)

Gregory McCormac (Dean of Science in FLC)

Niloofar Radgoudarzi (Gregory McCormac's Girlfriend who was Night Shift Lab Tech)

Mehdi Radgoudarzi (FLC Volunteer who is Niloofar's father)

Molly Senecal (Interim Dean of Student Success, Title IX Officer in FLC)

Robert Perrone (Executive Director of Union)

James Telles (Union Member)

So, all of the above people knew about this obvious violation.

After this obvious violation happened (on August 2020), when Robert Perrone (executive director of union) wanted to follow this obvious violation again, **Jacob Knapp** (one of the Losrios leadership line members) stopped Robert Perrone's following and told Robert Perrone, that Saeid and Sonia are **no longer** Losrios employees so, Union could not support or follow their protests.

As you can see in Exhibit # 8, so we filed two other distinct complaints in EEOC with the following information:

Previous EEOC charge of Saeid (# 555-2020-01236 on 09/10/2020 with Bryan Hoss)

Previous EEOC charge of Sonia (# 555-2020-01235 on 09/10/2020 with Bryan Hoss)

After we rejected EEOC mediation and our **distinct** charges were transferred to investigation section of EEOC, **only two Losrios administration members** responded to our several protests (our second notification about hiring new adjunct

faculty) after **COUPLE MONTHS**, to pretend that Losrios is not a part of this obvious violation and they tried to protect Losrios, but it was too late.

These two Losrios administration members are:

1. Peter Khange
2. Jacob Knapp

1. Peter Khang (director of human resource in Losrios who signed position statement of Losrios which is full of accusations, disinformation, misinformation and dishonesty against us)

2. Jacob Knapp (one of the Losrios leadership line members) on December 1st 2020, after that Losrios had sent their first position statement to EEOC (on November 25th 2020), finally after **THREE MONTHS**, he responded to our email that you can see it in Exhibit # 45 (Email # 66).

1. Peter Khang (director of human resource in Losrios who signed position statement of Losrios which is full of accusations, disinformation, misinformation and dishonesty against us):

After hiring new adjunct faculty by Gregory McCormac instead of us for Fall 2020, we had contacted to Peter Khange and notified him regarding hiring new adjunct faculty instead of us. One of them was on August 22nd 2020 that you can see it in Exhibit # 43 (Email # 58) and the other one was on September 7th 2020 that you can see in Exhibit # 44 (Email # 61) but we did not receive any response from Peter Khange.

Finally, On October 17th 2020, when our 2 distinct cases transferred to investigation section of EEOC, after **TWO MONTHS**, Peter Khange responded to several emails which we had sent to him as you can see it in Exhibit # 40 (Email # 63).

These two emails included all of the documents and proof of our protest to Peter Khange regarding this obvious violation **BUT** we didn't receive any response from Peter Khange regarding those emails that you can see in Exhibit # 42 (Email # 58 & 61) till October 17th 2020 that our charges transferred to investigation part of EEOC.

As you can see in Exhibit # 40 (Email # 63), Peter Khange accepted hiring **NEW** adjunct faculty (Dr. Heather Roberts) instead of us happened, but he brought this excuse that **NEW** adjunct faculty hiring instead of us, has happened according to Dr. Heather Robert's experiences in online teaching, while:

Firstly, Peter Khange's excuse was **contrary** to what he stated on May 28, 2020 that "adjunct faculty hiring will not happen" that you can see in Exhibit # 41 (Email # 53).

In addition to it, as you can see in Exhibit # 36 (Email # 51, 53 & 55) both Peter Khange and Robert Perrone told us that FLC administration let them know that **NEW** adjunct faculty hiring won't happen and from the courses which was available, one of them gave to un-preference adjunct faculty (who was Kamran Shoaeci) and the rest of them, will give to **full-time faculty**.

As you can see in Exhibit # 37 (Email # 55) Peter Khang emphasized that he would **monitor** FLC administration to prevent the violation, but he did **NOT** because as you can see in Exhibit # 38 (Email # 54 & 55), Peter Khang told us on May 28th & 29th 2020 that he personally talked to Monica (Vice President of FLC who is direct supervisor of Gregory McCormac), and Monica let him know that **NEW** adjunct faculty hiring won't happen and from the courses which were available, one was given to un-preferenced adjunct faculty (who was Kamran Shoaeci) and the rest, will be given to **full-time** faculties (FT).

Secondly, Peter Khange's excuse was **contrary** to what Monica Pactol (Vice President of FLC) stated on May 14, 2020 that Monica explained to us which **COURSE REDUCTION** affected on us **NOT** online teaching experience that you can see it in Exhibit # 18 (Email # 48).

Thirdly, according to students' feedback and our survey that we got from the students at the end of each semester through emails, prior my laid off, my performance was satisfactory in both online and on ground but in or around February 2021, Losrios cut off our access to our emails, proof, evidence, canvas material, emails of outlook, students' feedback and our survey that we got from the students at the end of each semester through emails.

Fourthly, **NONE** of the adjunct faculties in Human Anatomy & Physiology department in FLC (such as Michelle Lee, Osario or Kamran Shoaeci) had **online teaching experience** more than us.

As you can see in Exhibit # 37 (Email # 55), Peter Khang had emphasized that he would **MONITOR** FLC administration to prevent the violation which we mentioned to him before, but he did **NOT** and finally the obvious violation (hiring **NEW** adjunct instead of us: Dr. Heather Roberts) happened on August 2020, while we already had notified losrios administration about this violation, **FOUR MONTHS** in advance (since May 2020 till Aug 2020 that you can see in Exhibit # 35, Email # 50 to # 57).

- 2. Jacob Knapp (one of the Losrios leadership line members) on December 1st 2020, after that Losrios had sent their first position statement to EEOC (on November 25th 2020), finally after THREE MONTHS, he responded to our email that you can see it in Exhibit # 45 (Email # 66):**

As you can see in Exhibit # 46 (Email # 62), on September 2nd 2020, we had sent email **DIRECTLY** to Jacob Knapp with all of the documents and proof regarding hiring new adjunct faculty instead of us which has happened by Gregory McCormac but Jacob Knapp did not respond to us until December 1st (after 3 months that our EEOC Charge was transferred to investigation section of EEOC).

As you can see in Exhibit # 45 (Email # 66), finally on December 1st 2020, after **THREE** months that we notified Jacob Knapp regarding this obvious violation and also after that losrios position statement had send to EEOC, Jacob Knapp responded to us that he started to hire internal investigator for our complaint, but it was too late.

As you can see in Exhibit # 47 (Email # 67 & 68), We responded back to him and told him that losrios is **NOT qualified** to investigate this obvious violation because losrios is **one main part** of this obvious violation.

We also told him: “you Jacob Knapp and Peter Khang, participated in this obvious violation because we notified both you several times **BEFOR** and **AFTER** this violation happening and both you could stop it but you did **NOT** and you **pretend** that Losrios is not a part of this obvious violation and you try to protect Losrios, but it was too late.”

We had notified Jacob Knapp, about hiring **NEW** adjunct faculty by Greg McCormac at least **2 times**:

First Time (Indirect Notification to Jacob Knapp through Robert Perrone): As you can see in Exhibit # 48 (Email # 57), the first time was through Robert Perrone (executive director of union) on May 13th 2020, **BEFORE** hiring **NEW** adjunct faculty that Robert Perrone contacted to Jacob Knapp per our request.

After Jacob Knapp contacted to FLC administration, they told to Jacob Knapp the same things which they had explained to Peter Khang (Exhibit # 41 in Email # 53) that hiring **NEW** adjunct faculty won't happen and from the courses which were available, one of them gave to un-preferenced adjunct faculty (who was Kamran Shoaie) and the rest of them, will give to **full-time** faculty (FT).

Second Time (Direct Notification through our email): As you can see in Exhibit # 46 (Email # 62), the second time on September 2nd, **AFTER** hiring **NEW** adjunct faculty, we directly sent Jacob Knapp email with all proof and documents to protest regarding this obvious violation but Jacob Knapp didn't respond to our email until after **THREE** months that losrios position statement had send to EEOC that you can see it in Exhibit # 45 (Email # 66).

As you can see in Exhibit # 46 (Email # 62), after our direct email to Jacob Knapp on September 2nd because he didn't answer to our email, so we asked Robert Perrone (executive director of union) to follow this violation again through Jacob Knapp (because Robert was in the cc of Email # 62 in Exhibit # 46), Jacob Knapp stopped Robert Perrone's following and told to Robert Perrone that Saeid and Sonia are **no longer** losrios employees and Union can't support them.

So, all of the above FLC and Losrios Administration participated in this violation because Gregory McCormac is son of their former Dean (Gregory McCormac's father was their former Dean in ARC and has lots of connections with FLC and Losrios administration members).

As you can see in Exhibit # 8, on or about September 10, 2020, I filed EEOC Chg. 555-2020-01235, Sonia Sayyedalhosseni v. LOS RIOS COMMUNITY COLLEGE DISTRICT. This charge includes allegations of retaliation related to my primary EEOC Charge of Discrimination. This charge is open and under investigation.

While this charge was under the investigation, I have been displaced from work, but I remained an employee in the Respondent's database (as you can see in Exhibit # 49, confirmed via the Respondent's position statement, in Page 4 & 5, in response to EEOC Question 6, dated November 25, 2020, in which the employer acknowledges that there is no evidence about my termination and I am currently employee.).

8th Losrios's Violation: Cut off our Access to our Outlook Emails, Proofs and Evidences in or around February 2021

Before starting clarification about this section, I want to mention to this point that as you can see in Exhibit # 51, Exhibit # 50 & Exhibit # 49, Losrios Community College District (my employer) answered officially to EEOC in 3 consecutive years that I am currently their employee (it means that I am currently faculty member and university professor in Losrios Community College, LRCCD).

You can see that part of Losrios response to EEOC which mentioned to my employment status which has been signed by **Peter V. Khang** who is **Director of Human Resources in Losrios Community College District** in following exhibits and dates as below:

- Exhibit # 51: LRCCD Position Statement to EEOC on **August 3rd 2022** in response to **Question # 2, 15, 16, 17, 18 & Question # 20 of EEOC.**
- Exhibit # 50: LRCCD Position Statement to EEOC on **March 15th 2021** in response to **Question # 6 of EEOC.**
- Exhibit # 49: LRCCD Position Statement to EEOC on **November 25th 2020** in response to **Question # 6 of EEOC.**

If you need to get confirmation of those above documents, you can contact with **Peter V. Khang** who is **Director of Human Resources in Losrios Community College District** by the following contact information:

Khangp@losrios.edu

(916)568-3063

As you can see in Exhibit # 49, Losrios Community College, LRCCD, mentioned **several times** through **several ways** in response to **Question # 2, 15, 16, 17, 18 & Question # 20 of EEOC** the following sentences:

“Ms. Sayyedalhosseini, was never discharged from his employment” or

“There is no individual who replaced Ms. Sayyedalhosseini” or

“Ms. Sayyedalhosseini was never disciplined nor discharged from her employment” or

“Ms. Sayyedalhosseini was not laid off from her employment”

As you can see in Exhibit # 51, Exhibit # 50 & Exhibit # 49, I’ve covered other part of Losrios Position Statement to EEOC (except their response regarding my employment status) because I have placed full response version of Losrios Position Statement in other Exhibits (Exhibit # 57, 58 & 59) and in this part I just wanted to emphasize to the part of Losrios response to EEOC which is related to my employment situation. The Losrios position statement regarding this **EEOC charge # 555-2020-01235** has been placed in Exhibit # 57.

On or about January 30, 2021, I discovered that access to my work email address had been rescinded while all of my documents, proofs, email records and evidence was in my Losrios email. When I contacted Respondent to clarify why I couldn’t access my work email, I was advised that I wasn’t showing up as an employee in their database (contrary to what they already have mentioned in all 3 Losrios Position Statements).

By restricting my access to my e-mail, I have been cut off from my evidence, proofs, email records and documents that I need to support my EEOC charges.

Accordingly, as you can see in Exhibit # 52, I signed 2nd Charge # 555-2021-00521 on 02/04/2021 with EEOC. The respondent repeated their previous excuse that they had mentioned in their first Position Statement. The respondent also mentioned again this point in their 2nd position statement regarding Charge # 555-2021-00521, in Page 4 & 5, in response to EEOC Question 6, dated March 15, 2021 in which the employer acknowledges that there is no evidence about my termination and I am currently employee. (As you can see in Exhibit # 50)

As you can see in Exhibit # 49 & Exhibit # 50, Losrios mentioned on their both position statements that **Dr. Sonia Sayyedalhosseini is currently employee**. The strangest thing, is this point that contrary to what Losrios has mentioned on page 4 & 5 of both their position statements, (in response of Question # 6 of EEOC) that **Dr. Sonia Sayyedalhosseini is currently employees but they cut off my access to outlook account**.

9th Losrios's Violation: Hiring 2 More New Adjunct Faculties instead of us for Spring 2022 for in Person Classes (Rahman Ferdosi & Abigail Analeigh). They Have Proved this Point that All Their Excuses regarding Course Reduction in COVID-19 Situation (Monica Pactol's Excuse, Exhibit # 18 who is FLC Vice President) or Dr. Heather Roberts' Online Experience in Teaching (Peter Khange's Excuse, Exhibit # 19 who is Director of Human Resources in Losrios) were only Excuses to Cover Their Retaliation & Violations against us.

As you can see in Exhibit # 53, the FLC class schedule website was on **TBA status** in the beginning of January 2022.

As I have mentioned previously, in FLC Biology Department whenever Gregory McCormac wanted to hire a new professor, the FLC class schedule website changed to TBA. So, it was a sign for us that Gregory McCormac again started to hire 2 more new adjunct faculties instead of us which was another retaliation against us.

As you can see in Exhibit # 54, on 01-15-2022, TBA status changed to **2 new names of faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh).**

These 2 classes are in person classes (on ground) and were the same courses that I have taught before and it is another evidence which proves this point that the excuse of **Peter Khange, Director of human resource in Losrios, regarding online teaching experience of Dr. Heather Roberts which led to hire her instead of me for Fall 2020 (on Exhibit # 19), exactly after that I filed complaint against Gregory McCormac, were just covers to hide their retaliation and violations against me.**

It is also another evidence which proves this point as well that the excuse of **Monica Pactol, Vice President of FLC, regarding course reduction in COVID-19 situation that affected on our termination in May 2020 (on Exhibit # 18), was also another excuse to cover and hide their retaliation and violations against me.**

By hiring 2 more New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), Respondent have proved this point completely that all their excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse as you can see in Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse as you can see in Exhibit # 19) were only excuses to cover and hide their retaliation and violations against me.

Accordingly, as you can see in Exhibit # 55, I signed 3rd Charge # 555-2022-00729 on 05/16/2022 with EEOC. The respondent repeated their previous excuse on their 3rd

Position Statement that they had mentioned in their 1st & 2nd Position Statements. The respondent also mentioned again this point in their 3rd position statement regarding Charge # 555-2022-00729, on August 3rd 2022 in response to Question # 2, 15, 16, 17, 18 & Question # 20 of EEOC that:

“Ms. Sayyedalhossseini, was never discharged from her employment” or

“There is no individual who replaced Ms. Sayyedalhossseini” or

“Ms. Sayyedalhossseini was never disciplined nor discharged from her employment” or

“Ms. Sayyedalhossseini was not laid off from her employment”

(As you can see it in Exhibit # 51)

In addition to it, as you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on August 23rd 2022, Losrios was known guilty in violation of Title VII of my Civil Rights on that. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 proves and establishes this point that Losrios’ decision to not to give assignments to us, was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also proves and establishes another point that all the accusations, misinformation and disinformation on Losrios Position Statements are False, Fake and Fabricated claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and

Considering this point that more than 99% of the concept of all Losrios’ Position Statements regarding my 1st, 2nd and 3rd charge are exactly the same (copy paste from each other if you compare them line by line), so all of the same accusations in my 2nd & 3rd charge are False, Fake and Fabricated claims/reports as well.

As you can see in Exhibit # 56, according to EEOC’s policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the same position that he/she would have been if the discrimination had never occurred

but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss, Dana Johansson and Patrick Gheorghe's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

Continuance of Losrios Violations which happened in Spring 2022 was hiring 2 other new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for in person classes while both of those classes are on ground (in person) not online. The continuance as well as repetition of Respondent's violations could be the result of Bryan Hoss, Dana Johansson and Patrick Gheorghe's strange and very worrying actions as EEOC Supervisors/investigators.

When Bryan Hoss, Dana Johansson and Patrick Gheorghe as EEOC Directors/investigators had strange and very worrying actions, who can stop Losrios violations????!!!!!!

Losrios has added another violation against me on its records which is hiring 2 new adjunct faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh)

10th Losrios's Violation: All Losrios's Accusations, Misinformation, Disinformation, Dishonesty, Derailment from the Main Subject and All the Other False, Fake and Fabricated Claims in All 3 Losrios Position Statements in Response to EEOC to Distort the Reality during the Investigation (We Rejected and Rebutted All of Them One by One, Line by Line with our Hereinafter Charge and Finally it Led to the Results of EEOC Investigation that Came up on August 23rd 2022 and Losrios was Known Guilty in Violation of Title VII of my Civil Rights as You Can See in Exhibit # 1).

As you can see in Exhibit # 1, the results of EEOC investigation of my first charge # 555-2020-01235 which came up on August 23rd 2022, Losrios was known guilty in violation of Title VII of my Civil Rights on that. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves and establishes** this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against Losrios in EEOC, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation** that they brought in all their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also **proves** and **establishes** another point that **all** the **accusations**, **misinformation** and **disinformation** on Losrios Position Statements are **False**, **Fake** and **Fabricated** claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and We could reject and rebut all Losrios's accusations with our Hereinafter charges (Opposition & Objection to Losrios Position Statements) which led to the results of EEOC investigation that came up on August 23rd 2022 and Losrios was known guilty in violation of Title VII of my Civil Rights on that.

You can see my Opposition & Objection to "Losrios's Position Statement" in Part # 2 of Section A of this statement .

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations** in **my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** as well.

You can see my Opposition & Objection to "Losrios's Position Statement" in Part # 2 of Section A of this statement .

11th Losrios's Violation: Law Misconduct during EEOC Investigation by the Influence of Losrios over Investigators (by Penetrating Pathway) to Protect the Son of Their Former Dean from Justice Punishment (Gregory McCormac's Father was a Former Dean in ARC who Has Many Connections in Losrios Administration).

As I clarified before, during the EEOC's investigation, the Law Misconduct happened several times by some EEOC's supervisors, directors and investigators. After we reported EEOC's violations to EEOC's Headquarters in Washington, 2 of them became fired from EEOC (Bryan Hoss & Dana Johansson) but there were some of their circles in EEOC of Oakland and San Francisco who were trying to misconduct the investigation again.

It could be either for influence of those Employers (Losrios) over investigators (by

Penetrating Pathway) to protect the son of their former Dean from justice punishment (Gregory McCormac's father was a former Dean in ARC who has many connections in Losrios Administration) or because of the investigator's discriminatory behaviors as well as Law Misconduct which has happened with any motivation from Losrios.

Finally, the severity and continuity of EEOC's violations led to filing complaint against EEOC by me. As you can see in Exhibit # 9, I have filed federal complaint against EEOC of Oakland and San Francisco on August 8th 2022 in U.S. **Northern District Court of California with Court Case # 22-cv-03367-YGR**.

The first strange, ridiculous, shameful, regrettable, weird and very worrying reaction of EEOC in response to my federal lawsuit against them was releasing the results of EEOC investigation for my first charge exactly 1 week after EEOC being served with my federal lawsuit against them!!!!!!:-)) Shame on Bryan Hoss and Dana Johansson's Circle because of procrastinating this case so far.

You can see more clarification and explanation regarding this part in **Section VIII** of this statement (**Violations of EEOC Supervisors and Investigators which is Law Misconduct which has happened by the effects of Losrios during investigation Process**)

***Section IV) Opposition & Objection to Reject & Rebut all Losrios's accusations, misinformation, disinformation, dishonesty to distort the reality and also for derailment from the main subject and all the other false, fake and fabricated claims in all 3 Losrios Position Statements in response to EEOC line by line (as much as possible)**

First of all, I want to clarify some important points regarding Losrios position statements before starting this section:

All 3 Losrios's Position Statements include lots of Accusations, Misinformation, Disinformation, Dishonesty, Derailment from the Main Subject to Distort the Reality during the EEOC Investigation.

We Rejected and Rebutted All of Them One by One, Line by Line with our Hereinafter Charge and Finally it Led to the Results of EEOC Investigation that Came up on **August 23rd 2022** and **Losrios was Known Guilty in Violation of Title VII of my Civil Rights** as You Can See in Exhibit # 1.

In addition to it, by hiring 2 more New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), Respondent have proved this point completely that all their excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse as you can see in Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse as you can see in Exhibit # 19) were only excuses to cover and hide their retaliation and violations against me.

Besides all the above, as you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022**, **Losrios was known guilty in violation of Title VII of my Civil Rights on that**. So, this violation is in continuance with their previous violations.

The results of EEOC investigation for my 1st charge was released **exactly 1 week after EEOC being served with my federal lawsuit!!!!!!:-))** because the severity and continuity of EEOC's violations during the investigation led to filing complaint against EEOC by me. As you can see in Exhibit # 9, I have filed federal complaint against EEOC of Oakland and San Francisco on **August 8th 2022** in U.S. Northern District Court of California with **Court Case # 22-cv-03367-YGR**.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves and establishes** this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against Losrios in EEOC, NOT other irrelevant, strange,**

ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation that they brought in all their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and ...

We could reject and rebut all Losrios's accusations with our Hereinafter charges (Opposition & Objection to Losrios Position Statements) which led to the results of EEOC investigation that came up on August 23rd 2022 and Losrios was known guilty in violation of Title VII of my Civil Rights on that.

Considering this point that **more than 99% of the concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations in my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** as well.

As you can see in Exhibit # 56, according to EEOC's policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the same position that he/she would have been if the discrimination had never occurred but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

As you can see in Exhibit # 49, Losrios Community College, LRCCD, mentioned **several times** through **several ways** in response to **Question # 2, 15, 16, 17, 18 & Question # 20 of EEOC** the following sentences:

"Ms. Sayyedalhousseini, was never discharged from his employment" or

"There is no individual who replaced Ms. Sayyedalhousseini" or

"Ms. Sayyedalhousseini was never disciplined nor discharged from his employment" or

"Ms. Sayyedalhousseini was not laid off from his employment"

BUT

My currently situation consists of the following items:

I don't have any assignments,

I don't have any monthly income from Losrios,

I don't have any employee benefits from Losrios such as: health insurance, union support or etc.

I didn't have access to my email records, proof, surveys, and materials.

Does it mean that I am currently their employee??!!!!!!

Absolutely Not.

You can see full version of All 3 Losrios Position Statements Sonia Sayyedalhoseini vs. Losrios, in Exhibit # 57, Exhibit # 58 & Exhibit # 59. I want to emphasize this point again and again that more than 99% of the concept of all Losrios' Position Statements regarding my 1st, 2nd and 3rd charge are exactly the same (copy paste from each other if you compare them line by line), so all of the same accusations in my 2nd & 3rd charge are False, Fake and Fabricated claims/reports as well.

I have **marked** all **accusations, disinformation, misinformation and dishonesty** in Losrios position statement line by line, one by one, with underline and also numbers, and I refer you in each of the following number to underline parts in Losrios position statements which I have placed it in Exhibit # 57, Exhibit # 58 & Exhibit # 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57.

By the following opposition and objections with well documents as well as credible proof, I rebut and reject all 3 Losrios position statements which are full of **accusations, disinformation, misinformation and dishonesty** in at least 26 items which they have mentioned in their position statements, that all of them were false, untrue and pure lies.

1) Opposition & Objection to Reject & Rebut the repetitive Accusation # 1 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 1 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As I have told to Micheal Hourani Officer of EEOC in my primary charge # 555-2020-00834 on 03/10/2020 as well as I have mentioned in my statement to internal investigator of Losrios (Megan) and I've explained to her in person on meeting date:

I had a meeting with Gregory McCormac to discuss his observation on

my performance as a first performance reviewer on 10/29/18. During the meeting he gave me some suggestion and I accepted all of them. At the end, when I wanted to leave his room, he told me that he has almost 20 years experiences of teaching and he has lots of ideas and suggestions to share with me but it needs more communication to make everything easier.

I responded that: "Of course, the goal of today's meeting was this point to share your suggestions with me. So, feel free to give me all your advice".

But Gregory McCormac said: "No, I meant **OUTSIDE** the college we should communicate more."

I told him: "Yes, Saeid (my husband) and I, want to invite you and your wife for dinner to our house and cook Persian food."

Gregory told me: "No, I meant that just you and I **WITHOUT** Saeid or anybody else, outside the college should be alone to communicate more."

During McCormac was talking to me on the meeting, he was making hand and finger in a gesture of a sexual nature by forming a circle with one hand and putting his index finger off his other hand in the circle.

By doing this he was making facial expressions which raised eyebrows in a way that suggested something sexual and tried to touch my hand even after I denied his request. I was really shocked and felt dry mouth and didn't find any word to say and it was very offensive and it hurts my feelings and the humiliation feeling was so bothering.

Gregory McCormac realized my angriness and told me: "No worries we can talk about it more lately, now you should go to your class and we will meet later on".

He asked me to reconsider his advances five other times (which wasn't in that meeting), and each time he made the same comments and gestures and he said there were many experiences that he wanted to teach me, this was meant in a sexual way.

The most recent incident was in or around late 2019, when I went to the main campus to pick up my paycheck. Gregory McCormac saw me accidentally and he repeated his inappropriate request. In or around January 2020, I became overwhelmed from his several behaviors.

As you can see in **My Psychiatrist's Notes and Report** in Exhibit # 24, I had shared Gregory McCormac's sexual harassment with psychiatrist who started to psychotherapy for me since the first incident (10/29/2018) till now.

The psychiatrist, seriously ordered to me to talk to Saeid about what had happened to me because Psychiatrist was so worried about my health.

I did not want to talk about these incidents with anybody else because she thought that Gregory McCormac's behavior is my fault. So, I hesitated to tell Saeid. The only person whom I talked to was my psychiatrist.

My Psychiatrist's Notes and Report which my psychiatrist sent to us on May 2020 because of our own lawyer's Request to File lawsuit Against Losrios by the EEOC Lawsuit Letter, is attached in Exhibit # 24, **BUT because we were laid off by Gregory McCormac Retaliation in May 2020 so we couldn't afford to pay the lawyer anymore and our lawsuit filed against Losrios was discontinued.**

Saeid and I, filed an internal complaint against Gregory McCormac in Losrios through union on February 2020.

In addition to our Union, as you can see in Exhibit # 33, we also filed the same complaint with EEOC with the following charge numbers:

Primary EEOC charge of Saeid (# 555-2020-00833 on 03/19/20 with M.Hourani).

Primary EEOC charge of Sonia (# 555-2020-00834 on 03/10/20 with M.Hourani).

2) Opposition & Objection to Reject & Rebut the repetitive Accusation # 2 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 2 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

Seeking a transfer from FLC main campus to EDC was **NOT** on my desire.

I was **FORCED** to ask for transferring from FLC to EDC because of Gregory's behavior. I wanted to protect myself from further unwanted sexual harassment by Gregory McCormac.

As you can see in Exhibit # 20, since 2015 till current, we live in Folsom, so FLC main campus which is located in Folsom, was my first choice because we didn't have car on that time and also as I have mentioned it in my statement to Megan (internal investigator), I had told Greg that if he doesn't accept my transfer to EDC, I would quit teaching in Losrios, because at first Gregory McCormac didn't want to accept my transfer and persisted to keep me in Main Campus in Folsom.

Also, as you can see in Exhibit # 21, I stated on step 1 of my availability form (section 1.6) that my first choice is FLC main campus, then FLC Rancho Cordova and last choice was FLC Eldorado. As you can see in step 2 of availability form, my physical address is written Folsom.

As you can see in Exhibit # 22 (google map website), the distance between my house and FLC main campus is only 9 minutes but the distance between my house and EDC is 31 minutes, so it is obvious that for me it was completely better to stay at FLC main campus instead of EDC.

I emphasized again that I requested to transfer to EDC because I wanted to protect myself from further harassment by Greg so, although our home was in Folsom and we didn't have car to go to EDC [which is located in Placerville (too far from our home)], I requested for transfer. The documents on Exhibit # 20 are the best reference that proves my physical address has been in Folsom since 2015 till now.

3) Opposition & Objection to Reject & Rebut the repetitive Accusation # 3 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 3 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

Saeid (my husband) filed a complaint against Dean McCormac for retaliation **NOT ONLY** as a result of my denial to meet privately with Dean, but also because of targeting Saeid based on Greg's girlfriend manipulation. (Niloofar Radgoudarzi, night shift lab tech in FLC main campus).

I believe McCormac, targeted my husband because of **TWO** reasons (not only one):

- 1) I had rejected his sexual harassment in 6 occasions.
- 2) We had rejected all illegal and unethical requests of Niloofar Radgoudarzi, night shift lab tech of FLC who stated she is Greg's Girlfriend. Niloofar Radgoudarzi was former Greg's student in ARC and when Greg became Dean in FLC in 2018, he hired her in spring 2019 as a night shift lab tech of FLC which had flexible schedule hours during week!!!

The First Time That Saeid Became Targeted by Greg (11-18-19):

As you can see in Exhibit # 25 (Emails # 4 & 5), on 11/12/19, Gregory McCormac asked Saeid to have meeting with him regarding student **CONCERNS** while fortunately, Saeid got student survey couple days before that. This came up exactly 2 days after Niloofar (night shift lab tech who told us that she is Greg's girlfriend) threatened us to fire us by her influence over Greg which was after we had rejected all her illegal and unethical requests.

Fortunately, Saeid has recorded Greg's voice during the meeting because couple days before that, Niloofar threatened us to fire us by her influence over Greg. That's why Saeid recorded his voice in the meeting, as well as he got student survey.

As you can see in Exhibit # 26 (Email#13) (which include Saeid's concerns about the meeting that he shared with Gregory McCormac in January 2020 when Saeid became overwhelmed):

On 11/18/19, Greg and Saeid, had meeting about student concern. Before starting the meeting when Saeid was in the waiting room, Greg McCormac told him in front of me that he should wait more because Greg received many complains about Saeid and his class so, he wanted to collect all of them.

BUT during the meeting before he started the meeting when Saeid placed student surveys on Greg's table, he became shocked and he changed his comment from **SO MANY complaints** into just **TWO students concerns** and told Saeid that just two students had concerns about some things. The voice of Gregory McCormac during this meeting is available.

The STRANGEST thing was that although Saeid & Greg had reviewed 2 times all students survey together during the meeting, **BUT** they could **NOT** find even one of those 2 students' **CONCERNS** that Greg had mentioned in the beginning of the meeting. Also, at the end of their meeting Greg talked about Niloofar that it didn't relate to that meeting at all.

As you can see in Exhibit # 27 (Email # 5), although everything was clear for Saeid that students' concerns was just excuse to target him and student's survey protected Saeid **BUT** Saeid preferred to pretend that he believed Greg's concerns to keep peace in his workplace.

As you can see in Exhibit # 26 (Email # 13), when Saeid became overwhelmed in 15th January 2020 (15 days **BEFORE** that he scheduled performance review for him), Saeid explained all the above matters to Gregory McCormac on 01-15-20 and he placed Chair of department, Professor Rogers on Cc and Saeid asked Greg to clarify those paradox matters in Email # 13, **but Greg did not answer to this email at all.**

4) Opposition & Objection to Reject & Rebut the repetitive Accusation # 4 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 4 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59: (in response to Question # 19 to EEOC). The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

We believe that the Losrios District had hired Megan M. Donaghey of the Shaw Law Group **NOT** to perform an independent investigation into our complaint to realize the truth and reality but they had hired her only for protecting their Dean (Gregory McCormac who was also the son of their former Dean: Gregory McCormac's father was former Dean in Losrios ARC).

As you can see in Exhibit # 61 (Email # 23, 24, 25, 26 & 27) and also as I have told to Micheal Hourani Officer of EEOC in my previous charge on March 2020:

We shared our concerns regarding to biased Internal Investigation of Losrios administration with Peter Khange (director of Human Resource) and officer of EEOC (Micheal Hourani).

We emphasized that Megan is **NOT** independent investigator.

After our meeting with Megan in or around March 2020, we concluded that she was hired for protecting Gregory McCormac as one of administration member as well as son of their former Dean because Gregory's father was former dean in losrios for

many years. She also didn't care about 30 email records; 40 minutes voice record of Gregory and 15 page our handwriting statement that we gave to her 10 days prior to our meeting with her.

She didn't pay attention to my main request either.

My main request from her was regarding to check Greg's office camera record on specific days and time which I defined for her in my statement. Unfortunately, she didn't either do it or write any explanation on her investigation results regarding to the camera records.

If Megan did our main request regarding to check Greg's office camera in specific days and times which we gave to her, Megan Could understand that Greg who has affair with Niloofar (night shift lab tech in FLC who was his former student), is not a credible person, neither as a dean nor as a teacher.

Because in each department, the philosophy of having dean is protecting faculties, students and colleagues from any harassment or discrimination.

5) Opposition & Objection to Reject & Rebut the repetitive Accusation # 5 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 5 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

It is so clear that Gregory McCormac denied his inappropriate request and his denial was predictable. It is obvious that the harasser denies sexual harassment.

As you can see in the **Result of Losrios Biased Investigation**, Exhibit # 23, Allegation # 1 of Losrios Investigation, Line 3, Losrios Investigator mentioned:

"McCormac acknowledged that he likely said that the two of you should communicate more, but for legitimate business reasons. You were a new Adjunct Professor with short teaching experience at the time, and Mr. McCormac's suggestion to communicate was to help you become a better teacher."

While in Losrios position statement in Underline number # 5, they've mentioned that:

"McCormac has never made comments about meeting privately outside the college."

As I mentioned in Underline number # 4, If Megan did our main request regarding to check Greg's office camera in specific days and times which we gave to her, Megan Could understand that Greg which has affair with Niloofar (night shift lab tech in FLC who was his former student), is not a credible person, neither as dean nor as teacher.

Because in each department, the philosophy of having dean is to protect faculties, students and colleagues from any harassment or discrimination.

6) Opposition & Objection to Reject & Rebut the repetitive Accusation # 6 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 6 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 76 [Emails # 41(page 2; paragraph 4)] that I have sent to all FLC and Losrios administration who were involved in our cases after biased internal investigation of Losrios was done as well as you can see in (page 8 of Saeid's complaint against Niloofar and Greg which gave to Megan):

Our **MAIN** request from Megan (internal investigator) was checking camera records of Greg's office in specific days and times (everyday between January 6th 2020 till January 31st 2020, only from 6:00 PM till 8:30 PM) to clarify that they had an affair and Gregory McCormac is not a credible person at all.

But as you can see in Exhibit # 23 (Result of Losrios biased internal investigation), Megan **neither** check the camera of Greg's office **nor** writing any explanation regarding to our main request (check camera record) in investigation results paper.

Since Nov 18, 2019 that Saeid saw the effects of Niloofar's threatening and also Greg started targeting Saeid and he continued targeting in Jan 2020 and according to Saeid's **observations** in the first semester (Spring 2019) that I have mentioned it below, we (Saeid & I) started to observe Greg's office imperceptible every evening in Jan 2020.

As we mentioned to Megan, we cannot say anything else but our **MAIN** request from internal investigator (Megan) was checking camera records of Greg's office in specific days and times (everyday between January 6th 2020 till January 31st 2020, only from 6:00 PM till 8:30 PM) to figure everything out.

The main question was: what is the necessity of having too much meeting between a Dean (Gregory McCormac) with a night shift lab tech (Niloofar Radgoudarzi) while she has another direct supervisor (Linda Meroux), more specifically out of regular work hours of dean without setting any appointments while the door is locked from inside??!!!!!! The work hours of dean schedule are 8:00 AM- 5:00 PM.

If Megan did our main request regarding to check Greg's office camera in specific days and times which we gave to her, Megan could understand that Greg who has affair with Niloofar (night shift lab tech in FLC who was his former student), is **not a credible person, neither as a dean nor as a teacher.**

Because in each department, the philosophy of having dean is protecting faculties, students and colleagues from any harassment or discrimination.

Saeid's observations in the first semester (Spring 2019):

In spring 2019 (the first semester that Saeid was hired), he had class in the evening shift, during the lab class 7 PM to 10 PM, sometimes he needed night shift lab tech (Niloofar) to find some models for students and when he looked for her and could not

find her, he had to go to Greg's office to ask him about lab tech, because on the first semester Sacid had no idea about work-hours of Greg and he thought Greg stays at college until the last class ends. Each time, Sacid saw the door of Greg's office was locked but the light was on so he knocked the door and waited for a couple minutes and then Greg opened the door and came out and said: "I have a meeting with Niloofar; she will come to help you soon."

On that time, it wasn't unusual or strange for Sacid because he thought any employee may have a meeting with Dean but after a while he figured it out that every time that we as faculty need to see Greg, we have to set an appointment with Linda Santora (his secretary) in advance and we cannot just go to his office without appointment. Sacid also figured out that the work hours of dean schedules 8:00 AM- 5:00 PM.

As you can see in Exhibit # 76 [Emails # 41 (page 2; paragraph 4)] that I have sent to all FLC and Losrios administration who were involved in our cases on May (when "internal biased investigator" result came up), I clarified that **My MAIN** request from Megan (internal investigator) was checking camera records of Greg's office in specific days and times (everyday between Jan 6th 2020 till Jan 31st 2020, only from 6:00 PM till 8:30 PM) to figure this point out that, on this period of time, how many times Niloofar went to Greg's office and how long she stayed over there to clarify that they had an affair, but Megan **Neither** check the camera **Nor** gave any explanation about our main request (check camera record) in investigation result paper.

7) Opposition & Objection to Reject & Rebut the repetitive Accusation # 7 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 7 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 33 (Charge # 555-2020-00834 on 03/10/20 with M.Hourani, EEOC investigator) as well as in my statement to internal investigator of Losrios:

On six occasions, I was subjected to sexual harassment by Greg McCormac, Dean of the Biology Department. More specifically, on **October 29, 2018**, and **October 23, 2019**, and **November 5, 2019**, Mr. McCormac made an unwanted sexual advance to me. I remember the exact date of 3 occasions which I mentioned above but I am not sure about the exact date of 3 other occasions.

Secondly, according to my statement that I gave to Megan (internal investigator) , I asked for transfer to EDC in spring 2019, to protect myself from further sexual harassment while my home was on Folsom and also I didn't have car and EDC was too far from my home and I spent money a lot to pay for Uber.

Thirdly, My Psychological records which is provided by my psychiatrist shows that I was under psychiatric therapy from November 2018 till now.

8) Opposition & Objection to Reject & Rebut the repetitive Accusation # 8 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 8 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

In or around January 2020, I became overwhelmed from Gregory McCormac's several behaviors both towards Saeid and I. The brief summary of the dates that Gregory McCormac harassed us include:

- 1) The brief dates of Greg's harassment toward Sonia: **October 29, 2018**, and **October 23, 2019**, and **November 5, 2019**. There are also three more occasions that I don't recall the exact dates.
- 2) The brief dates of Greg's harassment toward Saeid: **November 18, 2019** and **January 9, 2020** and **January 14, 2020**.

All the above harassments towards Saeid and I, made me so overwhelmed because I didn't tell anything to Saeid about Greg's harassment towards me and after Niloofar Radgoudarzi (Night shift lab tech who introduced herself as Gregory McCormac's girlfriend) threatened to fire us, I couldn't handle one more case (Saeid being targeted) at the same time in my mind.

My psychiatrist who started to psychotherapy with me from first incident (10/29/2018) till now, seriously ordered to me in or around January 2020 to talk to saeid about what had happened to me because Psychiatrist was so worried about my health.

I did not want to talk about these incidents with anybody else because I thought that Gregory McCormac's behavior is my fault. So, I hesitated to tell Saeid. I only let my psychiatrist know.

In or around **January 15, 2020** after 3rd incident happened to Saeid (change in website class schedule) both us, talked to **James Telles** (union member of FLC) and **Robert Perrone** (executive director of Losrios), and about whatever happened to us.

Since **January 15, 2020** until **February 5, 2020**, we were communicating with our union members (James Telles and Robert Perrone) to clarify for them what exactly happened between us and Gregory McCormac with details. We had at least 3 meetings with our union in FLC main campus at Folsom and Office of our union (Robert's office) in downtown Sacramento.

Finally, after all meetings with union, we wrote our complaints against Gregory McCormac with details and as you can see in Exhibit # 75 (in first page of it), we filed it on **February 5, 2020**.

As you can see in Underline number # 8, Losrios has mentioned in their position statement that:

"Ms. Sayyedalhoseini waited to file complaint when she was due for performance evaluation."

It is totally an accusation which is false and untrue because as you can see in Exhibit # 67 (Email # 14A & 14B), Greg scheduled for us **performance review** on **January 30, 2020** while based on the above explanation, we started our communication with union regarding Gregory McCormac's behaviors since in or around Jan 15, 2020, two weeks prior to Greg schedules performance review.

The **2 weeks period** between **the start of our conversation with union** (in or around Jan 15, 2020) and **Greg scheduled performance review** (Jan 30, 2020) was because of at least 3 meetings with our union in FLC main campus at Folsom as well as Office of our union (Robert's office) in downtown Sacramento to clarify for them what exactly happened between us and Gregory McCormac with details.

In addition to the above explanation and as we have clarified in Underline number # 11, we were not fearful of performance at all. Never Ever. Our complaints were not related to the performance review at all and our complaints were the result of harassments by Greg. Because as you can see in Exhibit # 68 (Email # 15A & 15B), Sacid and I accepted the performance reviews which scheduled by Greg on the same day that Greg sent invitations.

My Psychiatrist's Notes and Report which my psychiatrist sent to us on May 2020 Because of our own lawyer's request to file lawsuit against Losrios by the EEOC lawsuit letter, **BUT because we were laid off by Gregory McCormac Retaliation in May 2020 so we couldn't afford to pay the lawyer anymore and our lawsuit filed against Losrios was discontinued.**

9) Opposition & Objection to Reject & Rebut the repetitive Accusation # 9 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 9 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

100 times Shame on them. I wish, they experience sexual harassment to could feel humiliation that I have experienced and the sides effects of it still remain in my soul.

We **NEVER EVER** had **POOR** performance review.

We were **NOT** fearful of performance review **AT ALL**. We immediately accepted his evaluation on the same day.

We **NEVER EVER** had **POOR** performance review.

Firstly, as you can see in Exhibit # 73, my performance review in Fall 2018, shows that Most of the options was satisfactory and also if you take look on it from 17 items, I got satisfactory in 14 items which led to get assignment to continue teaching in 2019 and from those 17 items only 3 items marked as need improvement (**NOT** unsatisfactory).

So, I have **NEVER EVER** had poor performance or unsatisfactory items in my evaluation paper.

Secondly, in addition to the above explanation, as you can see in Exhibit # 60 (Email # 2, Email # 3B₁, Email # 3B₂, Email #... 3B₉), during semesters, because of both us (Saeid & Sonia), had awesome performance so, the previous chair (Dr. David Lagala) asked us to cover some of his classes during the time that he could not attend to his class and all departments member appreciate it (Email # 2) even Gregory McCormac as Dean (Email #3A₁).

Both of us, covered some classes of Dr. Lagala (Previous Chair) in fall 2019 as well as spring 2020. (Email # 3B)

For fall 2019, I had students survey which shows that most of my students (29 students from 30 students), 96.6 %, were happy and satisfied.

Thirdly, besides all the above, as you can see in Exhibit # 71 "Spring 2020 Hands-on Science Center Activity" which is placed at the end of this pdf, we were elected by Chair of the department (Professor Sherry Rogers) as Faculties for Science Center Activity on January 2020 for cadaver dissection activity. I have attached proof of Science Center Activity at the end.

As you can see in Exhibit # 68 (Email # 15A & 15B), we were **NOT** fearful of performance review **AT ALL**. We immediately accepted evaluation on the same day.

Fourthly, as you can see in Exhibit # 70, in addition to Folsom Lake College, we were teaching Human Anatomy and Physiology in California Northstate University, CNSU, which has higher education level in compare of Community College and it is more professional than College.

Besides all the above, we had student survey for previous semester which was completely satisfactory.

10) Opposition & Objection to Reject & Rebut the repetitive Accusation # 10 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 10 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 68 (Email # 15 B), contrary to what Losrios has mentioned in their position statement, I was **NOT** fearful of performance review **AT ALL** to fabricate anything. I immediately accepted his evaluation on the same day that Greg scheduled for us.

As you can see in Exhibit # 70, in addition to Folsom Lake College, we were teaching Human Anatomy and Physiology (same course) in California Northstate University, CNSU, which has higher education level in compare of Community College and it is more professional than Community College.

Besides all the above, we also had student survey for every semester which always it was completely satisfactory in online and on ground.

As you can see in Exhibit # 60 (Email # 2, Email # 3B₁, Email # 3B₂, Email #... 3B₉), in addition to the above explanation, during semesters based on both us (Saeid & Sonia) having awesome performance, so the previous chair (Dr. David Lagala) asked us to cover some of his classes during the time that he could not attend to his class (in Fall 2019 as well as Spring 2020) and all departments members such as Dr. David Lagala (**previous chair**) and Professor Sherry Rogers (**current chair**) appreciated our help (Email # 2, 3, 3B₁).

EVEN Gregory McCormac as a Dean of department appreciated our helps (Email # 3A₂). Both of us covered many classes of Dr. Lagala in fall 2019 and spring 2020.

Besides all the above, as you can see in Exhibit # 71 in "**Spring 2020 Hands-on Science Center Activity**", both of us were elected by Chair of the department (Professor Sherry Rogers) as Faculties for Science Center Activity on January 2020 for cadaver dissection activity class.

Finally, as you can see in Exhibit # 73, my performance review in Fall 2018, shows that Most of the options was satisfactory and also if you take look on it from 17 items, I got satisfactory in 14 items which led to get assignment to continue teaching in 2019 and from those 17 items only 3 items marked as need improvement (**NOT** unsatisfactory).

as you can see in Exhibit # 72, Saeid's performance review in Spring 2019, shows that Most of the options was satisfactory and also if you take look on it from 17 items, he got satisfactory in 14 items which led to get assignment to continue teaching in next semester and from those 17 items only 3 items marked as need improvement (**NOT** unsatisfactory).

So, we have **NEVER EVER** had poor performance or unsatisfactory items in our evaluation papers.

11) Opposition & Objection to Reject & Rebut the repetitive Accusation # 11 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 11 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 74 (Email # 16 & Email # 17), contrary to what Losrios has mentioned in their position statement, we did **NOT** seek to have someone other than McCormac give our review performance. **NEVER EVER**. I accepted his evaluation immediately, Email # 15 B.

As you can see in Exhibit # 74 (Email # 16), couple days after Saeid has accepted evaluation, Saeid suggested to Greg that his evaluation team could be **consist of**

Gregory McCormac as dean and also one Human Anatomy & Physiology Professor (instead of Eric Wada who teaches Basic Biology) and Saeid has **NEVER EVER** scared from evaluation by Greg. Email # 16 shows, Saeid has accepted evaluation by Greg McCormac and suggesting to him **about another faculty reviewer (instead of Eric Wada) NOT Gregory McCormac.**

Also, as you can see in Exhibit # 68 (Email # 15A for Saeid and Email # 15B for Sonia), Saeid and Sonia immediately accepted the evaluation for performance review which scheduled by Gregory McCormac on Jan 30, 2020 (Email # 14 B) on the same day. (15A & 15B).

I have never asked for evaluation performance by other person than Gregory McCormac and Saeid's suggestion about his performance team, was add one Human Anatomy & Physiology Professor besides Gregory for his evaluation. (Email # 16).

12) Opposition & Objection to Reject & Rebut the repetitive Accusation # 12 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 12 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 69 (Email # 21 & Email # 22):

Contrary to what Losrios has mentioned in their position statement, we did **NOT** request to halt or stop or postponed our performance evaluations once we filed our complaints. Losrios administration and **Molly Senecal (Interim Dean Title IX Officer)**, held our performance review.

Because in meeting with Molly Senecal on her office, she stated that according to District law, during the investigation, all connection or communication between parties **MUST** be ceased.

Molly Senecal ordered to us in the meeting with her that we have to stop all contact with Greg & Niloofar Radgoudarzi during investigation, so FLC/Losrios administration ordered to Greg to cancel our evaluation, Email # 21 & 22.

Even when Niloofar's father called, text and emailed me several times (after filling complaint against Greg and Niloofar), we didn't answer him and immediately we informed Molly Senecal and Peter Khange.

As you can see in Exhibit # 69 (Email # 21 & Email # 22), Administration according to District law instructed Gregory McCormac to cease any communication with us.

In addition to all the above explanation, as I will clarify it in Underline number # 9 & 10 & 13, **We NEVER EVER had POOR performance or UNSATISFACTORY items in our performance review. (Please read Underline number # 9 & 10 & 13).**

13) Opposition & Objection to Reject & Rebut the repetitive Accusation # 13 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 13 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

100 times Sham on them. I wish, they experience sexual harassment to could feel humiliation that I have experienced and the sides effects of it still remain in my soul.

We NEVER EVER had POOR performance review.

We were NOT fearful of performance review AT ALL. We immediately accepted his evaluation on the same day.

We NEVER EVER had POOR performance review.

Firstly, as you can see in Exhibit # 73, my performance review in Fall 2018, shows that Most of the options was satisfactory and also if you take look on it from 17 items, I got satisfactory in 14 items which led to get assignment to continue teaching in 2019 and from those 17 items only 3 items marked as need improvement (NOT unsatisfactory)

So, I have NEVER EVER had poor performance or unsatisfactory items in my evaluation paper.

Secondly, in addition to the above explanation, as you can see in Exhibit # 60 (Email # 2, Email # 3B₁, Email # 3B₂, Email #... 3B₉), during semesters, because of both us (Saeid & Sonia), had awesome performance so, the previous chair (Dr. David Lagala) asked us to cover some of his classes during the time that he could not attend to his class and all departments member appreciate it (Email # 2) even Gregory McCormac as Dean (Email #3A₁).

Both of us, covered some classes of Dr. Lagala (Previous Chair) in fall 2019 as well as spring 2020. (Email # 3B)

For fall 2019, I had students survey which shows that most of my students (29 students from 30 students), 96.6 %, were happy and satisfied.

Thirdly, besides all the above, as you can see in Exhibit # 71 "Spring 2020 Hands-on Science Center Activity "which is placed at the end of this pdf, we were elected by Chair of the department (Professor Sherry Rogers) as Faculties for Science Center Activity on January 2020 for cadaver dissection activity. I have attached proof of Science Center Activity at the end.

As you can see in Exhibit # 68 (Email# 15A & 15B), we were NOT fearful of performance review at all. We immediately accepted his evaluation on the same day.

Fourthly, as you can see in Exhibit # 70, in addition to Folsom Lake College, we were teaching Human Anatomy and Physiology in California Northstate University,

CNSU, which has higher education level in compare of Community College and it is more professional than College.

Besides all the above, we had student survey for previous semester which was completely satisfactory.

14) Opposition & Objection to Reject & Rebut the repetitive Accusation # 14 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 14 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

Seeking a transfer from FLC main campus to EDC was **Neither** on my desire **nor** voluntarily. I was **FORCED** to ask for transferring from FLC to EDC because of Gregory's behavior. I wanted to protect myself from further unwanted sexual harassment by Gregory McCormac.

Firstly, as you can see in Exhibit # 20, since 2015 till currently, we live in Folsom, so FLC main campus which is located in Folsom, was my first choice because we didn't have car on that time and also as I have mentioned it in my statement to Megan (internal investigator), I had told Greg that if he doesn't accept my transfer to EDC, I would quit teaching in Losrios, because at first Gregory McCormac didn't want to accept my transfer and persisted to keep me in Main Campus in Folsom.

Secondly, as you can see in Exhibit # 21, I stated on section 1 of my availability form (section 1.6) that my first choice is FLC main campus, then FLC Rancho Cordova and last choice was FLC Eldorado. As you can see in step 2 of availability form, my physical address is written Folsom.

Thirdly, as you can see in Exhibit # 22 (google map website), the distance between my house and FLC main campus is only 9 minutes but the distance between my house and EDC is 31 minutes, so it is obvious that for me it was completely better to stay at FLC main campus instead of EDC.

Fourthly, I emphasized again that I requested to transfer to EDC because I wanted to protect myself from further harassment by Greg so, although our home was in Folsom and we didn't have car to go to EDC [which is located in Placerville (too far from our home)], I requested for transfer. The documents on Exhibit # 20 is the best reference that proves my physical address has been in Folsom since 2015 till now.

15) Opposition & Objection to Reject & Rebut the repetitive Accusation # 15 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 15 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 39, although remote operation led to **hiring freeze** in COVID-19 situation but Gregory has hired **NEW** adjunct faculty (Dr. Heather Roberts) for two distinct courses instead of us although we notified several times all FLC and Losrios administration member regarding to this violation **BEFORE** and **AFTER** happening this violation but they didn't prevent of this obvious violation.

Losrios administration has helped in occurrence of this obvious violation by **IGNORING** our **SEVERAL** notifications which we had sent them **BEFORE** and **AFTER** this violation (**HIRING NEW** adjunct faculty, Dr. Heather Roberts, instead of us exactly one semester after we participated in complaint) and they has derailed in their position statement on purpose from main subject (violation against us by hiring **NEW** adjunct faculty instead of us) and didn't mention to it **EVEN** once and focused on their internal investigation while our complaints include:

- Hiring new adjunct faculty (Dr. Heather Roberts) instead of us exactly one semester after we have filed complaints against Losrios.
- Cutting off our access to our email records, proofs, documents, surveys and teaching materials while they were under the investigation.

16) Opposition & Objection to Reject & Rebut the repetitive Accusation # 16 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 16 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

In the position statement of Losrios, Peter Khange has stated that:

"The limited number of courses in their discipline was assigned to **Preference and Full-Time** faculty members as required by the faculty collective bargaining agreement".

As you can see in Exhibit # 77 (Email # 43 & Email # 53):

Based on Email # 43 (Exhibit # 77), Losrios gave assignments to **Kamran Shoaee**, who is **UN-preference** adjunct faculty and he came to our department 1 year after Sonia and 1 semester after me while in position statement of Losrios, Peter Khange stated that courses were assigned to **preference** faculties. That is completely false because Kamran Shoaee is un-preference adjunct faculty.

Based on Email # 53 (Exhibit # 77), and also as you can see **class schedule of fall 2020** in Exhibit # 39, Losrios got **NEW** adjunct faculty (Dr. Heather Roberts) for two distinct courses instead of us for fall 2020 while in position statement of Losrios, and Peter Khange stated that courses were assigned to preference and full-Time faculties. That is completely false.

This obvious violation has happened while as you can see in Exhibit # 35 (Email # 50 to Email # 57), we had notified all FLC and Losrios administrations several times in

ADVANCE that Gregory McCormac wants to hire **NEW** adjunct faculty instead of us and it is obvious violation against us because we filed complaint against him. **BUT** Losrios did **NOT** stop him, because Gregory McCormac is son of their former Dean.

17) Opposition & Objection to Reject & Rebut the repetitive Accusation # 17 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 17 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in FLC class schedule in Exhibit # 39, as well as I have explained to Bryan Hoss Supervisor of EEOC in my previous Charge and also current charge, **our courses were available, contrary to what they stated in their position statement.**

Between May 2020 till August 2020, we came to learn that the courses that we were teaching, remain available and that the Respondent hired a **NEW** professor (**Dr. Heather Roberts**) instead of us to teach the same course that we taught while we had notified all FLC and Losrios administration several times in **ADVANCE** (from May 2020 until August 2020), that Gregory McCormac wants to hire **NEW** adjunct faculty instead of us and it is obvious violation against us because we filed complaint against him, **BUT** Losrios administration did **NOT** stop him.

Prior to our laid off, our performance was satisfactory in both online and on ground, according to email feedback and students' survey but unfortunately Losrios in another violation cut off our access to our emails.

NONE of the adjunct faculties in Human Anatomy & Physiology department in FLC (such as Michelle Lee, Osario or Kamran Shoaie) had **online teaching experience** more than us.

After hiring **NEW** adjunct faculty by Gregory McCormac which happened on August 2020, we protested again and again several times to all FLC and Losrios administration that this obvious violation which we already had notified all you, finally has happened in front of your eyes while we had notified all you regarding this violation **BEFORE** and you could stop it, but you did **NOT**.

In addition to it, those 2 courses became available for in person (on ground) classes in Spring 2022. And, as I clarified before, **Continuance of Losrios Violations which happened in 2022 (hiring 2 other new adjunct faculties instead of us: Rahman Ferdosi & Abigail Analeigh) for in person classes while both of those classes are on ground (in person) not online. The continuance and repetition of Respondent's violations could be the result of Bryan Hoss and Dana Johansson's strange and very worrying actions as EEOC Supervisors as well as their circle.**

And by hiring 2 New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), Respondent proved this point

completely that all their excuses about course reduction in COVID-19 situation (Monica Pactol's Excuse in Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse in Exhibit # 19) were only excuses to cover and hide their retaliation and violations against me.

In addition to it, as you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022**, **Losrios was known guilty in violation of Title VII of my Civil Rights on that**. So, this violation is in continuance with their previous violations.

18) Opposition & Objection to Reject & Rebut the repetitive Accusation # 18 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 18 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

We know that as non-preference adjuncts, we are not entitled to an assignment under the district's collective bargaining agreement. **BUT this is NOT the point.**

According to constitution of law of United State of America, retaliation against individuals who file a complaint or participate in a complaint process or protected activity, is in violation of District policy, as well as State and Federal laws. (Title VII of the Civil Rights Act of 1964, as amended)

We had participated in a protected activity and had filed complaint against dean of FLC in our union as well as EEOC on spring2020, but 1 month after EEOC gave us lawsuit letter against Losrios and also couple days after the result of Losrios biased internal investigation came up, we were laid off by Gregory McCormac without any explanation.

Monica Pactol (Vice President of FLC), brought this excuse that **10% COURSE REDUCTION** regarding to COVID-19 situation affected on both of us for Fall 2020 assignment, **BUT** they hired **NEW** adjunct faculty (Dr. Heather Roberts) instead of us for the 2 distinct courses that we had taught before.

After hiring **NEW** adjunct faculty by Gregory McCormac which happened on August 2020, we protested again and again several times to all FLC and Losrios administration that this obvious violation which we already had notified all them, finally has happened in front of their eyes while we had notified all them regarding this violation **BEFORE** and they could stop it, but they did **NOT**.

None of Losrios administration responded to us until we rejected EEOC mediation then investigation by EEOC began. You can find proof of above events, our notifications as well as our protests to Losrios and FLC administration **BEFOR** and **AFTER** happening this violation, in the following protocol:

- 1) As you can see in Exhibit # 35, Email # 50 to # 57, related to our notifications

to FLC and Losrios administration **BEFORE** hiring **NEW** adjunct faculty instead of us.

- 2) As you can see in Exhibit # 42, Email # 58 to # 68 related to our protest to Losrios administration's silence **AFTER** hiring **NEW** adjunct faculty instead of us.

Losrios administration has helped in occurrence of this obvious violation by **IGNORING** our **SEVERAL** notifications which we had sent them **BEFORE** and **AFTER** this violation (**HIRING NEW** adjunct faculty instead of us exactly one semester after we participated in complaint) and they have derailed in their position statement on purpose from main subject (violation against us by hiring **NEW** adjunct faculty instead of us) and didn't mention to it **EVEN** once.

Question: If it is not obvious violation, so what does violation mean?????!!!!

19) Opposition & Objection to Reject & Rebut the repetitive Accusation # 19 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 19 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59: (in response to Question # 2 to EEOC). The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

Losrios has stated in the position statement that: **"Ms. Sayyedalhousseini was never discharged/laid off nor disciplined from his employment"!!!!!!!!!!!!!!!!!!!!!!!!!!!!**

Losrios also mentioned in the response to EEOC Question # 2 that: **"Ms. Sayyedalhousseini IS an adjunct faculty member in biology department in Losrios"!!!!!!!!!!!!**

My currently situation consists of the following items:

I don't have any assignments,

I don't have any monthly income from Losrios,

I don't have any employee benefits from Losrios such as: health insurance, union support or etc.

I didn't have access to my email records, proof, surveys, and materials.

Does it mean that I am currently their employee????!!!!

Absolutely Not.

As you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022**, **Losrios was known guilty in violation of Title VII of my Civil Rights on that**. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves** and

establishes this point that Losrios' decision to not to give assignments to us, was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also proves and establishes another point that all the accusations, misinformation and disinformation on Losrios Position Statements are False, Fake and Fabricated claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and

Considering this point that more than 99% of concept of all Losrios' Position Statements to my 1st, 2nd and 3rd charge are exactly the same (copy paste from each other if you compare them line by line), so all of the same accusations in my 2nd & 3rd charge are False, Fake and Fabricated claims/reports against us as well.

In addition to it, as I clarified before, Continuance of Losrios Violations which is happening in 2022 (currently) is hiring 2 other new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for in person classes while both of those classes are on ground (in person) not online. The continuance as well as repetition of Respondent's violations could be the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle.

And by hiring 2 New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), Respondent have proved this point completely that all their excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse as you can see in Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse as you can see in Exhibit # 19) were only excuses to cover and hide their retaliation and violations against me.

In addition to it, as you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on August 23rd 2022, Losrios was known guilty in violation of Title VII of my Civil Rights on that. So, this violation is in continuance with their previous violations.

As you can see in Exhibit # 56, according to EEOC's policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the

same position that he/she would have been if the discrimination had never occurred but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

As you can see in the Exhibit # 53, the FLC class schedule website was on TBA status in the beginning of January 2022, but as you can see in the Exhibit # 54, on 01-15-2022, TBA status changed to 2 new names of faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh).

These 2 classes are in person classes (on ground) and were the same courses that I have taught before and it is another evidence which proves this point that the excuse of Peter Khange, Director of human resource in Losrios, regarding online teaching experience of Dr. Heather Roberts which led to hire her instead of me for Fall 2020 (on Exhibit # 19), exactly after that I filed complaint against Gregory McCormac, were just covers to hide their retaliation and violations against me.

It is also another evidence which proves this point as well that the excuse of Monica Pactol, Vice President of FLC, regarding course reduction in COVID-19 situation that affected on our termination in May 2020 (on Exhibit # 18), was also another excuse to cover and hide their retaliation and violations against me.

And by hiring 2 New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), Respondent have proved this point completely that all their excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse as you can see in Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse as you can see in Exhibit # 19) were only excuses to cover and hide their retaliation and violations against me.

In addition to it, as you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on August 23rd 2022, Losrios was known guilty in violation of Title VII of my Civil Rights on that. So, this violation is in continuance with their previous violations.

As you can see in Exhibit # 56, according to EEOC's policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the same position that he/she would have been if the discrimination had never occurred but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss and Dana

Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

Continuance of Losrios Violations which is happening in 2022 (currently) is hiring 2 other new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for in person classes while both of those classes are on ground (in person) not online. The continuance as well as repetition of Respondent's violations could be the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle.

We have too much serious concerns that both Bryan Hoss and Dana Johansson's strange and very worrying actions and also their circle who are still EEOC employees, regarding our cases, affected on Losrios behavior and Losrios becomes too rude that they hire 2 new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for Spring 2022 (in person classes) while Losrios is under ongoing investigations by EEOC which shows and proves the continuance of their violations and also rebuts their previous excuses.

When Bryan Hoss, Dana Johansson as 2 EEOC Directors and also their circle had strange and very worrying actions, who can stop Losrios violations????!!!!!!

And Losrios has added another violation against me on its records which is hiring 2 new adjunct faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh)

In addition to the above clarification, as you can see in this Underline number#21, they repeatedly mentioned at least 3 times that we are not their employees. (The green marks in Underline number# 21).

In fact, the paradoxes in Losrios position statement revealed that when EEOC asked them about our termination (which is retaliation against us, because we participated in complaints against them), Losrios answered that Saeid and Sonia are currently employees (in response to question # 6 of EEOC, in page 4 & 5 of all their four position statements) BUT when they want to bring some excuse to cover their action against us (cutting our access off from Losrios outlook accounts), as you can see in Underline number # 21, they repeatedly mentioned at least 3 times that we are not their employees.(the green marks in Underline number # 21).

Also, When Roberts Perrone (executive director of union) had notified Jacob Knapp (one of the leadership lines in Losrios), regarding to hiring NEW adjunct faculty in August 2020, Jacob Knapp told him that Saeid and Sonia are **No longer Losrios employees** and union can't support them anymore.

20) Opposition & Objection to Reject & Rebut the repetitive Accusation # 20 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 20 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59: (in response to Question # 13 & 14 to EEOC). The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

All Losrios and FLC administration who involved in our cases, have helped in occurrence of this obvious violation by **IGNORING** our **SEVERAL** notifications which we had sent them **BEFORE** and **AFTER** this violation (**HIRING NEW** adjunct faculty, Dr. Heather Roberts, instead of us exactly one semester after we participated in complaint) and they have **derailed** in their position statement on **purpose** from **main subject** (violation against us by hiring **NEW** adjunct faculty instead of us) and didn't mention to it **EVEN** once in their position statement.

As you can see in Exhibit # 35 & Exhibit # 42, in Cc part of all Email # 50 to 68, we had notified Losrios administration who involved in our cases, several times in **ADVANCE** (since summer 2020), that Gregory McCormac wants to hire **NEW** adjunct faculty instead of us and it is obvious violation against us because we filed complaint against him, **BUT** they did **NOT** stop him.

None of Losrios administration responded to us until we rejected EEOC mediation, then investigation by EEOC began. You can find proof of above events, our notifications and our protests to Losrios and FLC administration who involved in our cases, **BEFOR** and **AFTER** happening this obvious violation, in the following protocol:

- 1) In Exhibit # 35, Email # 50 to 57, related to our notifications to FLC and Losrios administration **BEFORE** hiring **NEW** adjunct faculty instead of us.
- 2) In Exhibit # 42, Email # 58 to 68 related to our protest to Losrios administration's silence **AFTER** hiring **NEW** adjunct faculty instead of us.

We had placed most of the FLC and Losrios administration members who were involved in our cases in cc part of most emails such as:

King Brian (Chancellor of Losrios);

Jacob Knapp (Leadership Line Member of Losrios)

Peter Khang (Director of Human Resource of losrios)

Whitney Yamamura [President of Folsom Lake College (as one branch of Losrios Community College District)]

Monica Pactol (Vice President of FLC & Direct Supervisor of Greg)

Gregory McCormac (Dean of Science in FLC)

Niloofer Radgoudarzi (Gregory McCormac's Girlfriend who was Night Shift Lab Tech)

Molly Senecal (Interim Dean of Student Success, Title IX Officer in FLC)

Robert Perrone (Executive Director of Union)

James Telles (Union Member)

As you can see in Exhibit # 35 as well as Exhibit # 42 (Email # 50 to Email # 68), EEOC Officers whom I had placed in Cc are:

Micheal Hourani (EEOC Officer for Primary Charge)

Bryan Hoss (EEOC Officer for our previous and Current Charge)

As you can see in Exhibit # 78, we have communicated with Dr. Ami Bera (Congressman of California) and also Senator Kamala Harris (Senator of California and Vice President Elected) regarding those obvious violations of Losrios and we have placed them in some of the recent emails, because according to Constitution of Law in United States, one way that Americans can participate in their democracy is call Representatives and Senators, as what we did.

In Cc part of almost all those Emails, there were all responsible persons in Losrios administration, FLC administration, Union administration, EEOC officers (Micheal Hourani and Bryan Hoss) and this obvious violation has happened in front of their eyes while Losrios is denying it .

21) Opposition & Objection to Reject & Rebut the repetitive Accusation # 21 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 21 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59: (in response to Question # 20 to EEOC). The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on August 23rd 2022, Losrios was known guilty in violation of Title VII of my Civil Rights on that. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 proves and establishes this point that Losrios' decision to not to give assignments to us, was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also proves and establishes another point that all the accusations, misinformation and disinformation on Losrios Position Statements are False, Fake and Fabricated claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19

Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and ...

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations** in **my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** against us as well.

22) Opposition & Objection to Reject & Rebut the repetitive Accusation # 22 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 22 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59: (in response to Question # 16, 17 & 18 to EEOC). The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

Continuance of Losrios Violations which is happening in 2022 (currently) is hiring 2 other NEW adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for in person classes which belonged to us before, while both of those classes are on ground (in person) not online.

As you can see in Exhibit # 53, the FLC class schedule website was on TBA status but since 01-15-2022, TBA changed to 2 New names of faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh)

It is another proof that **the excuse of Peter Khange, Director of human resource in Losrios on October 17th 2020, regarding online teaching experience of Dr. Heather Roberts** (who was hired instead of us for Fall 2020 exactly after that we filed complaint against Gregory McCormac) were just covers to hide their retaliation and violations against us.

It is also another proof that **the excuse of Monica Pactol, Vice President of FLC on May 14th 2020, regarding course reduction in COVID-19 situation that affected on our termination, were just covers to hide their retaliation and violations against us, although they proved it before by:**

1) Ignoring our several notifications in advance on summer 2020 according to changes in FLC Class Schedule website regarding hiring new adjunct faculty for fall 2020 instead of us (Dr. Heather Roberts) by Gregory McCormac (Dean of Science Department)

2) Hiring new adjunct faculty instead of us for fall 2020 (Dr. Heather Roberts)

3) Cut off our access to our outlook emails, proofs & evidences in or around Feb 2021

And by hiring 2 New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), they have proved this point that all their excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse, Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse, Exhibit # 19) were only excuses to cover their retaliation & violations against us.

As you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022**, **Losrios was known guilty in violation of Title VII of my Civil Rights on that**. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves** and **establishes** this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation** that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: **Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh)** and

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** to **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations in my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** against us as well.

As you can see in Exhibit # 56, according to EEOC's policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the same position that he/she would have been if the discrimination had never occurred but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

We have too much serious concerns that both Bryan Hoss and Dana Johansson's strange and very worrying actions and also their circle who are still EEOC employees, regarding our cases, affected on Losrios behavior and Losrios becomes too rude that they hire 2 new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for Spring 2022 (in person classes) while Losrios is under ongoing investigations by EEOC which shows and proves the continuance of their violations and also rebuts their previous excuses.

When Bryan Hoss, Dana Johansson as 2 EEOC Directors and also their circle had strange and very worrying actions and also, they have Law Misconduct several times purposely and intentionally, so who can stop Losrios violations????!!

23) Opposition & Objection to Reject & Rebut the repetitive Accusation # 23 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 23 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

Contrary to what Losrios mentioned their position statements (underline # 23), me and my husband did **NOT** apply for the adjunct pool in **November 2021**, not at all. The only time that we applied for adjunct pool was before became hired by Losrios.

I was hired by Losrios in **Fall 2018** so, the only time that I applied for adjunct pool was in or around **Fall 2018**.

My husband, Seyed Saeid Zamanieh Shahri, was hired by Losrios in **Spring 2019** so, he applied for adjunct in or around **Spring 2019**.

24) Opposition & Objection to Reject & Rebut the repetitive Accusation # 24 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 24 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59: (in response to Question # 17 to EEOC). The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

As you can see in the page # 7 of Losrios Position Statements (underline # 24), Losrios mentioned that **Ms. Sayyedalhoseini, was not hired because she was not in the adjunct pool when the hiring committee convened in December 2021.**

This sentence is contrary to what Losrios mentioned in the last paragraph of page # 3 of their Position Statements (first line of Underline # 17). In the last paragraph of page # 3 Losrios mentioned that **both Ms. Sayyedalhoseini and Mr. Shahri remain in the adjunct pool in their respective fields.** While they mentioned in the page # 7 (underline # 24) that **Ms. Sayyedalhoseini, was not hired because she was not in the adjunct pool when the hiring committee convened in December 2021!!!!!!!!!!!!!!**

25) Opposition & Objection to Reject & Rebut the repetitive Accusation # 25 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 25 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

In or around 01-30-2021, we figured it out that we don't have access to our outlook account of Losrios which has all our emails, proof, documents in support of our charges, evidence, canvas material, emails of outlook, students feedback and our survey that we got from the students at the end of each semester through emails.

It's happened while we had updated our Losrios password of our accounts in or around 01-06 2021 (24 days before they cut off our access). We have followed all instructions with the help center of outlook to reach out our account again. Finally help center, let us know that Losrios District cut off our access to our account .

I have called to the Losrios District and their representatives told us that you are not currently losrios employee and Dean of your department cut off your access .

We told the IT representative of Losrios that, we had an official letter from Losrios that mentioned this point on it, that We are currently losrios employee : Losrios Position Statement regarding charge # 555-2020-01235 on it, in response to Questions # 6 of EEOC).

But the representative of losrios repeated that in my system show you are NOT employee and the dean of your department cut off your access. Our voice conversation is available.

26) Opposition & Objection to Reject & Rebut the repetitive Accusation # 26 in all 3 Losrios' Position Statements that I have underlined as well as numbered it as Accusation # 26 in all 3 Losrios Position Statements in Exhibit # 57, 58 & 59. The Losrios position statement regarding this EEOC charge # 555-2020-01235 has been placed in Exhibit # 57:

We had all of our documents in support of our charges, email proof, student feedback & survey, evidence, canvas material and information regarding to our claims in losrios outlook account and they cut our access to our documents and proof while:

Firstly Losrios administrations are under EEOC investigation and by this action, they wanted to cut our access off from our proofs and documents which is against them.

Secondly they mentioned in the 1st losrios position statement regarding my charge # 555-2020-01235 on it, in response of Question # 6 of EEOC that Dr. Sayyedalhousseini is currently employee.

In fact , the paradoxes in Losrios position statement revealed that as you can see in

when EEOC asked them about our termination (which is retaliation against us, because we participated in complaints against them), Losrios answered that Saaid and Sonia are currently employees (in response to question # 6 of EEOC), BUT when they want to bring some excuse to cover their action against us (cutting our access off from Losrios outlook accounts), they repeatedly mentioned at least 3 times that we are not their employees.

Losrios cut off our access to our emails , proof , evidence , canvas material , emails of outlook , students feedback and our survey that we got from the students at the end of each semester through emails although we updated our passwords in or around January 2021 to keep our access to our proof and documents

***Section V) Further Clarification Regarding Losrios Violations**

1) As you can see in Email # 50 of Exhibit # 35, on 05/22/2020:

We have notified all FLC and Losrios administration in advance (Summer 2020), regarding to hiring NEW adjunct faculty for fall 2020 by Gregory McCormac FLC class schedule for Fall 2020 came up while the courses that we had taught appeared with TBA status which in our department, TBA is used for NEW adjunct faculty that's reason we became aware

2) As you can see in Email # 51 of Exhibit # 35, on 05/22/2020:

Robert Perrone, Executive director of our union didn't take TBA status and our notifications seriously.

3) As you can see in Email # 52 of Exhibit # 35, on 05/22/2020:

We have explained that TBA status in our department is used for hiring NEW adjunct faculty.

4) As you can see in Email # 53 of Exhibit # 35, on 05/28/2020:

Losrios explained that they have talked to FLC administration and hiring NEW adjunct did NOT happen and all courses gave to Full Time faculty and one un-preference adjunct faculty (who is Kamran Shoaee that came to our department one year after both us) also from 2 TBA courses, one of them was scheduled in error and the other one was given to Full Time faculty member. BUT hiring NEW adjunct faculty in fall 2020 showed that they were lying.

5) As you can see in Email # 54 of Exhibit # 35, on 05/28/2020:

We have explained to Losrios administration while Monica Pactol was on Cc, that TBA status in our department is used for hiring NEW adjunct faculty and this Gregory McCormac Strategy when he wants to hire NEW adjunct faculty.

6) As you can see in Email # 55 & 56 of Exhibit # 35, on 05/29/2020:

Losrios administration told us that they would monitor FLC administration for preventing of hiring NEW adjunct faculty. BUT hiring NEW adjunct faculty has proved that they did NOT monitor our notification to prevent of violation.

7) As you can see in Email # 57 of Exhibit # 35, on 05/13/2020:

Our union spoke with Jacob Knapp, and Jacob talked to FLC administration and FLC administration told to Jacob Knapp the same things that they had told to Peter Khang. BUT hiring NEW adjunct faculty proved that FLC administration were NOT honest neither with Peter Khang nor Jacob Knapp

8) As you can see in Email # 58 of Exhibit # 42, on 08/22/2020:

We informed all FLC and Losrios administration on August 2020 that our concern

regarding hiring **NEW** adjunct faculty was correct and this violation happened in front of their eyes and they didn't stop this violation although several times, we had noticed all of them

9) As you can see in Email # 59 of Exhibit # 42, on 08/22/2020:

We asked Peter Khang and Robert Perrone to clarify this violation.

Robert Perrone who is executive director of union called us through the phone and let us know that he sent our email to Jacob Knapp but Jacob Knapp told him that Sonia and Sonia are no longer Losrios employees and union can **NOT** support them. (But 3 months later on December 1st when EEOC had started investigation, Jacob Knapp sent an email to us to show off that he was not a part of this violation but he was.)

10) As you can see in Email # 60 of Exhibit # 42, on 08/24/2020:

Losrios administration told us that they are reviewing hiring **NEW** adjunct faculty and they would be in touch with us **SHORTLY** but unfortunately, they did **NOT** although several times we requested for their response.

11) As you can see in Email # 61 of Exhibit # 42, on 09/07/2020:

Although Losrios administration told us that they are reviewing hiring **NEW** adjunct faculty and they would be in touch with us **SHORTLY** but unfortunately, they did **NOT** although several times we repeated our request for their response. We believe that they didn't respond to us for 2 reasons:

1. They didn't take our prior notifications seriously and it led to their participation in this obvious violation and they thought that we wouldn't follow this case in this virtual situation
2. They wanted to protect Gregory McCormac both as their administration member and son of their former Dean. Because Greg's father was former dean of Losrios for many years.

12) As you can see in Email # 62 of Exhibit # 42, on 09/02/2020:

We had notified Jacob Knapp, regarding to hiring **NEW** adjunct faculty by Greg McCormac although he told to Robert Perrone (union) that we are no longer Losrios employees. **BUT** Jacob Knapp didn't answer us till December 1st (after 3 months) that EEOC started investigation.

13) As you can see in Email # 63 of Exhibit # 42, on 10/17/2020:

After 2 months that our cases transferred to investigation part of EEOC, finally Losrios administration responded to our emails to cover their violation

14) As you can see in Email # 64 of Exhibit # 42, on 10/17/2020:

Our response to excuses of Losrios administration that they wanted to cover their participation in violation against us.

15) As you can see in Email # 66 of Exhibit # 42, on 12/01/2020:

Jacob Knapp, after 3 months answered to our emails to protect Losrios from participation in this obvious violation while EEOC started to investigation

16) As you can see in Email # 67 of Exhibit # 42, on 12/02/2020:

In response to Jacob Knapp's email, we have clarified this point that retaliation against us has happened by Losrios administration, **NOT** only FLC administration. So, our complaint is against Losrios Community College District, not only FLC administration.

At the end of this section (Part B) I want to emphasize and clarify that;

The position statement of Losrios is full of accusations, **accusations, disinformation, misinformation and dishonesty** and derailment from main subject (hiring **NEW** adjunct faculty instead of us: Dr. Heather Roberts as well as cutting off our access to our emails records) regarding this charge and I have rebutted all of them line by line and one by one with the valid documental proof as much as I could.

As I have clarified and emphasized in Previous Part (Part A: Additional evidence and information section), based on my EEOC Form 5 (11/09); which is Discrimination Charge Form, and also according to all the above statements and documents in Exhibit Parts, my previous complaint against Losrios administration was **regarding their previous violation (hiring NEW adjunct faculty instead of me) and my current complaint is regarding new violation (cutting off my access to our emails records).**

BUT It is so **STRANGE** that Losrios in their position statement, has **DERAILED** from the main Subject **ON PURPOSE**, and they have just focused on our first (primary) complaints which we had filed against Gregory McCormac through union of Losrios regarding his sexual harassment (my charge) and targeting Saeid while our previous and current complaint based on our previous and current EEOC charge forms, are regarding their other violations (hiring **NEW** adjunct faculty instead of us as well as cutting off our access to our emails records).

We had participated in a protected activity and had filed complaint against dean of FLC through union as well as EEOC, but 1 month after EEOC gave us lawsuit letter against Losrios (in our previous EEOC charge) and also couple days after the result of Losrios internal biased investigation came up, we were laid off by Gregory McCormac without any explanation.

Monica Pactol (Vice President of FLC), brought this excuse that **10% COURSE REDUCTION** regarding to COVID-19 situation affected on both of us for Fall 2020 assignment **BUT** for Fall 2020, they hired **NEW** adjunct faculty (Dr. Heather Roberts) instead of us for the 2 separated courses that we had taught before.

Losrios administration has helped to occurrence this obvious violation by **IGNORING ON PURPOSE** our **SEVERAL** notifications which we had sent them

BEFORE and AFTER this violation (HIRING NEW adjunct faculty instead of us exactly one semester after we participated in complaint) and they have derailed in their position statement on purpose from main subject (violation against us by hiring NEW adjunct faculty instead of us) and didn't mention to it **EVEN ONCE.**

As you can see in position statement of Losrios, they did NOT mention on purpose to hire NEW adjunct faculty instead of us (Dr. Heather Roberts) NEVER EVER!! **EVEN ONCE.**

By all the above opposition in Part B (Underline number Parts), I rebut and reject with well documents as well as credible proof, the second (new) position statement of Losrios at least in 24 items which they mentioned in their new position statement that all of them were false, untrue and pure lies.

***Section VI Niloofar Radgoudarzi's Retaliation (Losrios' Lab Tech who manipulated and provoked her boyfriend (Gregory McCormac, dean of biology department) against me (Niloofar is Gregory McCormac's Girlfriend)**

Niloofar Radgoudarzi is FLC Lab Tech. She is girlfriend of Gregory McCormac (Dean of biology department in FLC). Niloofar was Greg's student when he taught biology in American River College (ARC).

Before I start this **section VI (Niloofar Radgoudarzi's Retaliation in Losrios)**, I want to mention to this point that recently I have received threats of violence from Niloofar Radgoudarzi by a suspicious person who is her cousin.

I had received a life-threatening call by **"What's app"** from someone who threatened me that if I mention to Niloofar Radgoudarzi's name or her father's name (Mehdi Radgoudarzi) in my Lawsuit against Losrios, I will be killed in USA and my family will be killed in Iran.

As you can see in Exhibit # 105 , this number belongs to Iran. So, I have saved this number as **"Suspicious person 1 who threatened us recently"**.

This life-threatening call has happened after that I had notified all Losrios and FLC administration on May 9th 2023 in advance that I will file a complaint against Losrios in district court during next 90 days from my DOJ federal lawsuit letter. You can see that prior notification in Exhibit # 115. Gregory McCormac (Niloofar Radgoudarzi's boyfriend) was on the Cc of that email.

Niloofar Radgoudarzi became aware of my decision regarding federal lawsuit by Gregory McCormac. So, she started to threaten our lives through **suspicious person 1** .

When I saved the number of that person as **"Suspicious person 1 who threatened us recently"**, I figured out & discovered this point that the name of suspicious person 1 is **Mona Radgoudarzi**. As you can see in Exhibit # 106, the **Username** of that suspicious person 1 who threatened us is Mona Radgoudarzi in **"Telegram"**. That's why I discovered that she is threatening our lives behind Niloofar Radgoudarzi.

Even the suspicious person 1, has sent me some life-threatening messages on July 25th 2023 that you can see some of those in Exhibit # 107. Those life-threatening messages includes some pictures of our house (residential address), our work place address and our gym address in USA.

By considering this point that the suspicious person's phone number belongs to Iran, so the suspicious person 1 has received our information and the pictures of our house and work place through Niloofar Radgoudarzi.

As you can see in Exhibit # 107, the suspicious person 1 threatened our lives by the following statement:

"If you mention the names of Niloofar Radgoudarzi, Mehdi Radgoudarzi or Fatemeh (Susan) Mirbabazadeh in your complaint against the college , you will be hurt in the worst possible way in America. In addition to it, your family will be killed in Iran . As you can see below, we have residential address of you in America as well as your family in Iran. We even found the address of your workplace and Gym in America. If you mention the names of the above people (Radgoudarzi Family) in your complaint, you will be killed in America wherever possible, in your workplace, Gym or your house. besides that, your family will be killed in Iran."

In addition to it, as you can see in Exhibit # 107, the suspicious person 1 mentioned to my house address in USA (713 Stafford Street, Apt # 46 , Folsom CA 95630), my former work place address in USA (2910 Prospect Park Drive, Rancho Cordova CA 95670) and my gym address in USA (700 Oak Avenue Parkway, Folsom CA 95630).

By considering this point that the suspicious person's phone number belongs to Iran, so the suspicious person 1 has received our information and the pictures of our house and work place through Niloofar Radgoudarzi.

In this time, Niloofar Radgoudarzi has provoked and manipulated one of her cousin from outside of USA to protect her cousin from justice of United States because previously in 2021, one of Niloofar Radgoudarzi's cousin whose name is Hengameh Hatami (from inside the USA), tried to kill us and as you can see in Exhibit # 91, the superior court of California after investigation everything issued 4 distinct civil harassment restraining orders against her.

In the beginning of this section VI (Niloofar Radgoudarzi's Retaliation in Losrios), First of all, I want to clarify this point that it is so sad, pity and shameful that an immigrant (Niloofar Radgoudarzi) has had so many violations and crimes since she came to United States. Niloofar Radgoudarzi wherever she has been, has caused severe violations there. As a college student in American River College of Losrios Community College, as a bachelor student in U.C. Davis University, as an employee in Folsom Lake College (as one branch of Losrios Community College District), she has caused severe violations and crimes in all the above locations.

When Niloofar Radgoudarzi was student in American River College, ARC (one branch of Losrios Community College District), she started romantic relationship with her biology professor who was Gregory McCormac. Regardless of the fact that Gregory McCormac was married, according to Education's Laws as well as Principles of American Federation of Teachers, any relationship out of educational framework is completely forbidden between Professor and student.

When she was student in Neuroscience field in U.C. Davis University (in or around 2017), she had had huge educational cheating record which led to drop all her courses in some semesters and also all her financial aides which she got, refunded back to university.

This background is available in U.C. Davis Department of Neuroscience and U.C. Davis Administration let us know that they are available to share Niloofar's cheating records with the court if the court asks them. Please please contact them to get confirmation regarding Niloofar's huge cheating records in her bachelor's period.

When Niloofar Radgoudarzi was employee as a night shift Lab tech in Folsom Lake College (as one branch of Losrios Community College District), she had some illegal and unethical requests from us because we were professors in Human Anatomy & Physiology in FLC and Niloofar Radgoudarzi was FLC lab tech, so for laboratory classes we were in touch. She also has manipulated and provoked her boyfriend [Gregory McCormac, Dean of Biology Department in Folsom Lake College (as one branch of Losrios Community College District)] to fire us because of both following reasons:

We rejected all of Niloofar's illegal and unethical requests as well as we also became aware of her relationship with the Dean of Department (Gregory McCormac).

In spring 2019, me and my wife (Dr. Sonia Sayyedalhoseini) Met Niloofar Radgoudarzi who was night shift Lab tech in FLC main Campus. She is Persian and she was excited to have Communication with us. So, she invited us to her family house for dinner and in return to her invitation, once we invited her family to our house and our communication continued.

As you can see in Exhibit # 75 (in my complaint against Niloofar Radgoudarzi and Greg which I gave to Losrios investigators on Spring 2020), During our Communication when Niloofar Radgoudarzi (night shift lab tech in our department) became close to us, she had some illegal, unethical and shameful behavior/requests from us since Spring 2019. She repeated her requests so many times and each time we rejected her.

*** Some of Niloofar's Illegal, Unethical and Shameful Suggestions/Behaviors are such as below:**

***1) Niloofar's Illegal, Unethical and Shameful Suggestions Regarding Her Offer About Shameful Academic Cheating Which Suggests us to Get Our Students' Lab Exam/Questions to Her for Selling to Students:**

During Spring 2019 as well as Fall 2019, Niloofar Radgoudarzi gave this offer to us that if we share some of our Lecture/Laboratory Question Exam with her, she could sell those to students and give money to us in return. Niloofar Radgoudarzi mentioned that some students have communication with her, so she could sell the Questions to them. We rejected her shameful offer and seriously let her know that if she repeats this kind of offers, we would report her to Human Resource.

***2) Niloofar's Illegal, Unethical and Shameful Requests Regarding Dishonesty in Her Research Activities:**

As you can see in Exhibit # 13, we are so active in Research activities and as we mentioned to it before, we are also Editorial Board Member, EBM, of some Medical Journals in United States of America as well as all around the world and every week and as you can see in Exhibit # 14, we review some research manuscripts which are submitted by scientists in journals to make decision about publication or not. This position (Editorial Board Member) has been awarded and granted to us by the Office of the Journal for using our research knowledge and experience. That's my honor and pleasure to serve.

As you can see in Exhibit # 15, in addition to Editorial Board Member, EBM, of Medical Journals, we are also Organizing Committee Member, OCM, in World Medical Conferences, International Symposium, Global Seminars, and World Medical Congress to determine articles of scientists to present as poster presentation or speech performance.

As you can see in Exhibit # 16, besides all the above positions (Editorial Board Member in Medical Journals & Organizing Committee Member in Medical Conferences), we are also Speaker in World Medical Conferences, International Symposium, Global Seminars, World Medical Congress such as Speaker in 2021 World Congress on Primary Health Care and Medicare Summit for Oral Presentation.

When Niloofar Radgoudarzi became aware that we are so active in research activities, she asked us to add her name as one of the authors in our research articles but we told her she did not participate in our research activities and it is a sample of dishonesty and let her respectfully and seriously know to stop these kinds of illegal and unethical requests.

***3) Niloofar's Illegal, Unethical and Shameful Requests to Get Fabricated Recommendation Letters From us for her School:**

Niloofar Radgoudarzi worked on her resume for medical School applications. She asked us to give her Recommendation letters from each of us that mentioned Niloofar Radgoudarzi is the best of best. Although she was not our student at all never ever but, we told her, let us think about it.

We went to UC Davis University where Niloofar Radgoudarzi got her bachelor degree there. We have figured it out that she had had **huge educational cheating record** which led to drop all her courses in some semesters and also all her financial aides which she got, refunded to university. So, we decided not to give her recommendation letters. Please contact UC Davis University to ask to confirm her huge cheating records.

***4) Niloofar's Illegal, Unethical and Shameful Requests to Get Fabricated Cash Gift Letters From us for U.S. Bank Home Mortgage Loans:**

In or around September 2019, Niloofar Radgoudarzi asked us to give her family a fabricated gift letter for U.S. Bank Home Mortgage Loans for the amount of \$ 15000 to \$ 20,000. Niloofar Radgoudarzi let us know that her family wanted to buy a new property in Fair Oaks and because of they don't want to inform IRS about the cash that they have, so they need a gift letter which shows someone donated \$ 15000 to \$ 20,000 cash to them so in this way it doesn't show up that much of their cash in their tax file.

Niloofar Radgoudarzi even gave us their U.S. Bank Loan Number as well as the contact information of Mary Fallon who was in charge of their home loan in U.S. Bank. Niloofar Radgoudarzi asked us to contact to Mary Fallon to prove us this point that she needs Cash Gift Letter only for Bank not something else, because Niloofar Radgoudarzi had become aware that we suspected her because of her previous requests (such as Recommendation Letters or Dishonesty in Research Activities).

The following information was something that Niloofar Radgoudarzi shared with us and asked us to mention to them in the letter:

U.S. Bank Loan Number # 2200955580

Mary Fallon 1508 Eureka Rd # 150. Roseville, CA 95661

mfallon@placertitle.com. Office: (916) 782 - 37 11 Fax: (916) 786 - 70 65

Please contact Mary Fallon to ask to confirm above matter.

***5) Niloofar's Illegal, Unethical and Shameful Behaviors Regarding Abusing from Our Cell Phones as well as Our Tablets:**

During our communication, Niloofar Radgoudarzi asked us so many times to give her our electrical devices with this excuse that she wants to become ready for medical school in advance, so she needs to study our teaching materials which we placed in our Canvas for our students. On that time, we trusted her and we gave our electrical devices such as tablets and cellphones to her several times for her studying.

In addition to it, based on Niloofar's request, we had scheduled for her to read some biological science books before going to medical school to be prepared in advance.

After a while, once her sister informed us to not let Niloofar Radgoudarzi use our electrical devices again because her sister stated that Niloofar Radgoudarzi used our electrical devices as well as our applications to send messages to herself (Niloofar Radgoudarzi) and then deleted the conversation from our devices.

We did not take Niloofar's sister's notice seriously. But after a while that we saw side effects of Niloofar's threatening by Gregory McCormac's behavior and targeting, we went to the police station and reported this issue. Police advised us to wait because we

didn't know about the concept of those messages that Niloofar Radgoudarzi had sent to either herself or someone else and deleted the records of conversations. Besides this, police recommended us that in future if we would figure out any abuse of our social media or bank account apps, so we should report it immediately. You can see the police report in Exhibit # 79.

***6) Niloofar's Illegal, Unethical and Shameful Suggestions Regarding her Money Laundering Circle for Bulk Cash Transferring to Regime of Iran by Breaking the United States Sanctions against Regime of Islamic Republics of Iran**

During our communication with Niloofar Radgoudarzi, she and her family (Mehdi Radgoudarzi who is Niloofar's father and Fatemeh Mirbabazadeh who is Niloofar's mother) had several illegal requests from us to join to Niloofar's money laundering circle for bulk cash transferring to Regime of Iran by breaking the United States sanctions against Regime of Islamic Republics of Iran.

As you can see in Exhibit # 80, in 2020, we reported the illegal offer of Niloofar Radgoudarzi and her family (Mehdi Radgoudarzi and Fatemeh Mirbabazadeh) to officers and investigators of ICE as well as Department of Homeland Security.

In addition to it, as you can see in Exhibit # 81, in 2020, we went to the Police Department to report their violations regarding bulk cash transferring to Regime of Iran by Breaking the United States sanctions against Regime of Iran.

As you can see in Exhibit # 82, Folsom Police Officer transferred our report to FBI for federal investigation.

As you can see in Exhibit # 83, in 2020, we had a meeting with some FBI officers regarding those aforementioned matters. On our meeting with FBI Officers, they asked us about some other violations of Radgoudarzi family which they may have received from others but we didn't know about it. So, we let the FBI officers know that we are not aware of those kind of violations.

Mehdi Radgoudarzi and his wife (Fatemeh Mirbabazade) have one company in Iran which name is " Parto Tabesh Mofid " . This Company registered with this number 351531. This Company is just a cover for their bulk cash transferring and also their money laundering to break the Sanctions of the United States of America against Regym of Iran.

Radgoudarzi Family (Mehdi Radgoudarzi, Niloofar Radgoudarzi, Nika Radgoudarzi and Fatemeh Mirbabazadeh) are living in USA but they have so many representative instead of themselves in around the world to make their circle.

Amirhossein Radgoudarzi (cousin of Radgoudarzi family) in Tehran, **Milad Hatami** (cousin of Hengameh Hatami) in Turkey and Niloofar Bahadorifar in California, are the circle of Radgoudarzi family to Money Laundering for Bulk Cash Transferring to Regime of Iran by Breaking the United States Sanctions against Regime of Islamic

Republics of Iran.

Amirhossein Radgoudarzi is Radgoudarzi family's representative in "Parto Tabesh Mofid" company in Tehran. Amirhossein is also a member of IRGC (Islamic Revolutionary Guard Corps) the same as Mehdi Radgoudarzi. IRGC is one of the known Terrorist groups of the Regim of Iran.

As you can see in Exhibit # 85, Milad Hatami who is one cousin of Hengameh Hatami had been arrested by Interpol Police Officers in 2021 because of his money laundering for Regime of Iran. Milad Hatami had committed with Niloofar Bahadorifar to break the sanctions of United States against Regime of Iran. You can see the report of Department of Justice regarding this matter in Exhibit # 86.

In addition to money laundering and bulk cash transferring for Regim's of Iran, another activity of Radgoudarzi's Company (Parto Tabesh Mofid) is regarding to nuclear medicine and radiology equipments.

Mehdi Radgoudarzi exports nuclear radiology medicine and material to Iran secretly through the Iranian passengers who travels to Iran. They also offer to people who wants to travel to Iran that if those Iranian people accept to transfer 20,000.00 Cash from U.S. to Iran, so they would pay 1000.00 \$ to them.

We also report any fraud which we see because as a person who loves United States, we feel responsible about United States. We believe in "we the people" and "Constitution of law".

***7) Niloofar's Illegal, Unethical and Shameful Suggestion Specifically to Professor Dr. Sonia Sayyedalhosseini to Divorce from Professor Dr. Seyed Saeid, Zamanieh Shahri and Marry with Someone whom suggested by Niloofar:**

During our communication with Niloofar Radgoudarzi, she offered to Sonia this illegal and unethical offer that if Sonia divorce Saeid, Niloofar has someone who loves Sonia and he wants to dedicate his life for Sonia. **Shame on Niloofar.**

Sonia rejected Niloofar's illegal, unethical and shameful suggestion.

***8) Niloofar's Illegal, Unethical and Shameful Suggestion Specifically to Professor Dr. Seyed Saeid, Zamanieh Shahri for Starting Emotional Relationship (Emotional Affairs)**

After Sonia rejected Niloofar's illegal, unethical and shameful offer, and told Niloofar that "I love my husband from the bottom of my heart and I won't change him with even the whole world", Niloofar called to Saeid and told him that she is a single girl and she wants to be his girlfriend!!!! Niloofar mentioned to Saeid that she felt in love with Saeid and that's reason she wants to be with Saeid.

Niloofar told Saeid that if Saeid accepts her request, their relationship can be private.

Niloofar also mentioned to Saeid this point that she has had experience of private relationship with another married man (Gregory McCormac, Dean of Biology Department in FLC) and she can manage this kind of private relationship in a way that it won't hit Saeid's marriage status. **Shame on her.**

Saeid rejected her shameful offer. During Niloofar and Saeid's conversation, Sonia was on the other phone and Saeid's phone was on speaker and Sonia could hear everything. Niloofar Radgoudarzi **used to these types of illegal, unethical and shameful relationships by having private relationship with Gregory McCormac, Dean of biology department.**

As I clarified above and also you can see in Exhibit # 75, I have mentioned to Niloofar's illegal, unethical and shameful suggestions/behaviors in my internal complaint via Losrios against Niloofar Radgoudarzi and Gregory McCormac on Spring 2020.

Niloofar Radgoudarzi repeated her illegal, unethical and shameful suggestions/behaviors so many times and each time we rejected her.

At first, she offered us money in return to her requests and when we refused her offers, she told us that she can give us flexible assignments such as her schedule by her romantic influence on Greg. She told us that she was Greg's student in ARC and they fell in love with each other and she can influence on Greg.

We stopped our communication with her. We didn't know she told the truth or lie about her romantic relationship with Greg, but based on our ethical principles and family upbringing, it was so bad that a single girl has romantic relationship with married man who is 30 years older than her.

Niloofar Radgoudarzi tried several times to contact with us but we ignored her. Finally, she became overwhelmed and started retaliation against us.

***Some of Niloofar's Retaliations against us are as below (after we rejected her and cut our communication with her):**

***1) Niloofar's Threatening to Fire us by her Influence, Provoking and Manipulating her Boyfriend (Gregory McCormac, the Dean of Biology Department in FLC):**

After a while that we cut our communication with Niloofar, once in the beginning of November 2019, she saw us in FLC and threatened us that if we reveal her romantic relationship with Greg; she would ask Greg to fire both of us.

We didn't take her serious because firstly we did not know that she told us the truth or not regarding her relationship with Greg. Secondly, we didn't want to share her allegation to anybody because that was not our business.

BUT couple days after Niloofar's threatening, Greg requested to have meeting for students concerns while I had students survey which showed that all my 62 students in 2 separated classes (100%) were happy and satisfied.

Based on these students' survey and also Niloofar's threatening, I could **GUESS** that students' concerns are fabricated so, I decided to record Gregory McCormac's voice in the meeting. By the those reasons that I have clarified in this statement, I became **SURE** that students concern **was fabricated**.

I believe, Niloofar Radgoudarzi did it against us in retaliation to rejection of all her illegal, unethical and shameful requests.

***2) Spreading and Distributing False, Fake, Fabricated, Forged and Altered Documents against us Between our Lab Students as well as Lodge's Members:**

After Niloofar Radgoudarzi became disappointed to fire Saeid on November 2019 by her influence, provoking and manipulating her boyfriend (Gregory McCormac, the Dean of Biology Department in FLC), she started to spread and distribute false, fake, fabricated, forged and altered documents against us since November 2019 between our colleagues, lab students and also the Lodge's members where Saeid is member.

Niloofar Radgoudarzi had taken those false, fake, fabricated, forged and altered documents from Hengameh Hatami (her cousin) because Niloofar is one of the Hengameh Hatami's Circle.

Hengameh Hatami was our former friend. Hengameh Hatami had so many **illegal, unethical and shameful requests** from us since in or around 2015 that we rejected her requests and cut our communication with her, then Hengameh Hatami had started retaliation against us by forging, altering and spreading **False, Fake, Fabricated, Forged and Altered** documents against us **among our residential neighbors, our close friends, our workplace, Federal Agencies and Iranian community to discredit us**. You can see the testimonies of some witnesses in Exhibit # 87.

Although Iranian people, our neighbors, our close friends and the property manager in Folsom Garden (who is Dorothea Ryan: she is the Folsom Garden Property Manager since at least 10 years ago), didn't believe Hengameh Hatami and they shared her accusations with us, but we ignored Hengameh Hatami's accusations, because we know ourselves better than everybody and also we have no doubt about ourselves, our principles and our behavior and also we were too busy with our research, teaching, volunteering and studying activities to follow gossip.

We also told those people who shared Hengameh Hatami's accusations with us that "time is the best judge".

Finally, when Hengameh Hatami became disappointed to discredit us, she committed to kill us in 4 distinct incidents through her circles. So, we filed 4 distinct lawsuits against her to get Civil Harassment Restraining Orders to save our lives. You can see the first page of those 4 distinct requests for Civil Harassment Restraining Orders in Exhibit # 84.

Hengameh Hatami did her best through her attorney to misconduct and derail judicial process by filing **several motions, requests and statements** against us such as the following motions:

- Motion to designating us as vexatious litigants
- Motion to consolidate 4 distinct cases
- Motion to post bond \$15,000.00 per case prior to trial or to have the cases dismissed
- Motion to order us to obtain a prefiling order before filing any new order
- Motion to issue judicial notice for us
- Motion to dismiss all cases
- Motion to issue statement of judge's decision

Fortunately, all of the above Motions were DENIED by different judges in different departments of Superior Court of California after evaluating and hearing date for each one. The Honorable Judges who were in those hearings and **DENIED** their Motions are as follows:

- * Honorable Judge Russell Hom in department # 47 (Denial Order in Exhibit # 88)
- * Honorable Judge Deborah Lobre in department # 1 (Exhibit # 89)
- * Honorable Judge Jonathan R. Hayes department # 1 (Denial Order in Exhibit # 90)

Finally, as you can see in Exhibit # 91, the **Honorable Judge Deborah Lobre** in department # 1 of Superior Court of California after investigation, discovered several crimes and violations of Hengameh Hatami, **so the Honorable Judge Deborah Lobre, punished Hengameh Hatami with 4 Distinct Permanent Civil Harassment Restraining Orders in 2021 as you can see it in Exhibit # 91.**

As you can see in Exhibit # 92, Police Sherri served Hengameh Hatami with 4 distinct Permanent Civil Harassment Restraining Orders.

Hengameh Hatami confessed on the hearing date in the Superior Court of California that Niloofar Radgoudarzi (Hengameh's cousin), took Hengameh to Gregory McCormac's office (Dean of biology department) in or around November 2019 and had met Gregory McCormac with Niloofar and shared with him those false, fake, fabricated and altered documents that she forged against us.

Hengameh Hatami also mentioned that Niloofar Radgoudarzi encouraged and motivated her to share those false, fake, fabricated and altered documents with

Gregory McCormac.

These 4 distinct Permanent Civil Harassment Restraining Orders shows the severity of Hengameh Hatami's Violations and crimes. Hengameh Hatami appealed those 4 Permanent Civil Harassment Restraining Orders by hiring attorneys from Los Angeles and spent more than \$50,000.00 to break the restraining orders because she would like to continue her harassment against us.

Finally, as you can see in Exhibit # 93, on April 27th 2023, Three Honorable judges of 3rd Appeal District Court of California (Honorable Judge EARL, J., Honorable Judge ROBIE, Acting P. J. and Honorable Judge MCADAM, J.) affirmed those 4 distinct Permanent Civil Harassment Restraining Orders by investigation and evaluation of around **6000 pages** of documents which had been filed by charging parties.

As you can see in Exhibit # 95, the certification from Appeal division of Superior Court of California regarding the volume of documents related to those 4 cases which is **6000 pages in 17 volumes**.

As you can see in Exhibit # 94, Police Sherrif served Hengameh Hatami with Appeal Court Decision which affirmed 4 distinct Permanent Civil Harassment Restraining Orders.

You can see some of Hengameh Hatami's accusations which are the same as Niloofar Radgoudarzi's accusations in Exhibit # 111.

***3) Niloofar's Accusations, Disinformation, Misinformation, False, Fake, Fabricated Reports against us to the Medical Board of California regarding our Legal Voluntary Activities:**

As you can see in Exhibit # 108, my wife and I are Editorial Board Member in one Persian Social Magazine in North of California which its name is Payam Javan Magazine. We are author of different kinds of articles regarding various fields such as Author of Monthly Articles about Iranian Traditional Music, Shajarian Page, Author of Monthly Articles about Mythical History of Iran, Author of Monthly Articles about Iranian Culture Customs and Persian National Traditions, Author of Monthly Articles about Ancient Persian Literature, Ferdosi Page, Author of Monthly Articles about one common Disease, Health Page. On the Health Page, we explain general information and knowledge regarding one common Disease. These knowledge and information include signs & symptoms, etiology (reason), pathophysiology, risk factors. We did NOT, do NOT and will NOT have any prescription, recommendation, suggestion, offer, advice, order or opinion regarding those Diseases at all, Never Ever. We mention to our email address in each article's page, only for this reason that audiences can give us the topics/subjects of their interests for next articles, that's it.

As you can see in Exhibit # 109, in addition to Health Page, all of other different kinds of articles regarding various fields includes our email address as well such as Monthly Articles about Iranian Traditional Music, Shajarian Page, Monthly Articles about

Mythical History of Iran, Monthly Articles about Iranian Culture Customs and Persian National Traditions, Monthly Articles about Ancient Persian Literature, Ferdosi Page, Monthly Articles about one common Disease, Health Page. And as I have clarified above, we mention to our email address in each article's page, only for this reason that audiences can give us the topics/subjects of their interests for next articles, that's it.

After we rejected all illegal and unethical requests of Niloofar Radgoudarzi, she and her circle (Mehdi Radgoudarzi, Fatemeh Mirbabazadeh, Nika Radgoudarzi & all other her circles) went to Medical Board of California and shared with them **accusations, disinformation, misinformation and dishonesty** against us to the Medical Board of California regarding our voluntary legal activities in Payam Javan Magazine.

Niloofar Radgoudarzi and her circle mentioned to Medical Board of California that Saeid and Sonia practice medicine in California illegally.

On December 10th 2019, Medical Board of California sent 3 investigators to our residential address in or around 6:00 AM. Although they came to us without any notification in advance but for transparency, we let them to come in our house and talked to me and Sonia separately. Sean Cogan talked to me and 2 of other investigators talked to Sonia in the other room. Despite we had teaching class at 9:00 AM but we let them to complete their questions and their evaluation. At the end of their evaluation, they let us know that some persons reported **accusations, disinformation, misinformation and dishonesty** about us to Medical Board.

They were impressed by our scientific activities as well as our voluntary services. They also went to Sarah Simmons (Peralta) Resident Services Coordinator II of Senior Mercy Housing located at 1720 Creekside Drive, Folsom CA 95630, where is one of the places that we do voluntary activities there since 2018.

Sarah Simmons (Peralta), clarified for Medical Board investigator that Saeid and Sonia come to this senior Mercy Housing every week to explain general information and knowledge regarding one common Disease. These knowledge and information include signs & symptoms, etiology (reason), pathophysiology, risk factors. Sarah also emphasized this point that Saeid and Sonia do NOT have any prescription, recommendation, suggestion, offer, advice, order or opinion regarding those Diseases at all, Never Ever. Sarah explained to investigator this point as well that Saeid and Sonia also take senior vital signs (Blood Pressure, Temperature, Pulse Rate and O2 Saturation) and seniors can write it on their own papers or not. Saeid and Sonia do not keep any resident's information at all, never ever.

After couple days, when we went to the investigator's office to follow the matter, Michel Marie Veverka, Supervising investigator, let us know that you are good and the matter became closed. She also appreciated our cooperation and patience. You can see the business cards of these Medical Board Investigators in Exhibit # 110.

Please contact Medical Board Investigators to ask to confirm above matter. As I have mentioned, their business cards are available in Exhibit # 110.

As you can see in Exhibit # 12, we have U.S. Equivalency through World Educational Service, WES of United States of America, and our U.S. Equivalency is Doctor of Medicine. So, we just use it for our Teaching Activities as well as Research Activities. That's it.

I believe, Niloofar Radgoudarzi did it against us in retaliation to rejection of all her illegal, unethical and shameful requests.

***4) Threat of Violence by Niloofar Radgoudarzi:**

Since 2020 that we have filed complaint in EEOC against Losrios Community College District, Niloofar Radgoudarzi has threatened us several times through several ways by several persons because we have mentioned to most violations of Niloofar Radgoudarzi (as Losrios lab tech) as well as Gregory McCormac (Dean of biology department who is Niloofar's boyfriend).

As we have clarified for Steven Hunt on March 23rd 2022, Director of Oakland Local Office, and you can see it in Exhibit # 96, during the EEOC's investigation, some persons on behalf of Niloofar Radgoudarzi as well as her family, threatened us that if we mention to her name on our EEOC complaint or any other responsible agencies and courts related to justice, she will kill us. Recently we saw suspicious commuting around our house and some suspicious people approaches our car when we leave house.

As I clarified above, the last incident that Niloofar Radgoudarzi threatened our lives was on July 2023.

I had received a life-threatening call by **"What's app"** from someone who threatened me that if I mention to Niloofar Radgoudarzi's name or her father's name (Mehdi Radgoudarzi) in my Lawsuit against Losrios, I will be killed in USA and my family will be killed in Iran.

As you can see in Exhibit # 105 , this number belongs to Iran. So, I have saved this number as **"Suspicious person 1 who threatened us recently"**.

This life-threatening call has happened after that I had notified all Losrios and FLC administration on May 9th 2023 in advance that I will file a complaint against Losrios in district court during next 90 days from my DOJ federal lawsuit letter. You can see that prior notification in Exhibit # 115. Gregory McCormac (Niloofar Radgoudarzi's boyfriend) was on the Cc of that email.

Niloofar Radgoudarzi became aware of my decision regarding federal lawsuit by Gregory McCormac. So, she started to threaten our lives through **suspicious person 1**.

When I saved the number of that person as **"Suspicious person 1 who threatened us recently"**, I figured out & discovered this point that the name of suspicious person 1 is **Mona Radgoudarzi**. As you can see in Exhibit # 106, the **Username** of that suspicious person 1 who threatened us is Mona Radgoudarzi in **"Telegram"**. That's

why I discovered that she is threatening our lives behind Niloofar Radgoudarzi.

Even the suspicious person 1, has sent me some life-threatening messages on July 25th 2023 that you can see some of those in Exhibit # 107. Those life-threatening messages includes some pictures of our house (residential address), our work place address and our gym address in USA.

By considering this point that the suspicious person's phone number belongs to Iran, so the suspicious person 1 has received our information and the pictures of our house and work place through Niloofar Radgoudarzi.

As you can see in Exhibit # 107, the suspicious person 1 threatened our lives by the following statement:

"If you mention the names of Niloofar Radgoodarzi, Mehdi Radgoudarzi or Fatemeh (Susan) Mirbabazadeh in your complaint against the college , you will be hurt in the worst possible way in America . In addition to it , your family will be killed in Iran . As you can see below , we have residential address of you in America as well as your family in Iran . We even found the address of your workplace and Gym in America . If you mention the names of the above people(Radgoudarzi Family) in your complaint , you will be killed in America wherever possible, in your workplace, Gym or your house . besides that , your family will be killed in Iran."

In addition to it, as you can see in Exhibit # 107, the suspicious person 1 mentioned to my house address in USA (713 Stafford Street, Apt # 46 , Folsom CA 95630), my former work place address in USA (2910 Prospect Park Drive, Rancho Cordova CA 95670) and my gym address in USA (700 Oak Avenue Parkway, Folsom CA 95630).

By considering this point that the suspicious person's phone number belongs to Iran, so the suspicious person 1 has received our information and the pictures of our house and work place through Niloofar Radgoudarzi.

In this time, Niloofar Radgoudarzi has provoked and manipulated one of her cousin from **outside of USA** to protect her cousin from justice of United States because previously in 2021, one of Niloofar Radgoudarzi's cousin whose name is Hengameh Hatami (from **inside the USA**), tried to kill us and as you can see in Exhibit # 91, the superior court of California after investigation everything issued 4 distinct civil harassment restraining orders against her.

In addition to it, in 2022, Niloofar Radgoudarzi tried to hurt us in our previous gym by one guy of her circle. His name is Maziar Habibvand. Maziar's father was close friend of Mehdi Radgoudarzi (Niloofar's father) and they were hired by IRGC (Islamic Revolutionary Guard Corps) which is one of the known Terrorist groups of the Regim of Iran.

You can see Mehdi Radgoudarzi (Niloofar's father) and Masoud Habibvand (Maziar's father) together in their picture in Iran-Iraq war in Exhibit # 104 (second picture).

In 2022, Maziar Habibvand (one circle of Niloofar Radgoudarzi) tried to hit us in our previous gym. As you can see in Exhibit # 98, we reported Maziar Habibvand to one of the Police Officers.

As you can see in Exhibit # 99, we have sent one email to the Police Officer to update him about the threats of violence that Maziar Habibvand had done against us previously in multiple incidents else because in addition to gym incident, Maziar Habibvand had 6 more illegal incidents that we clarified all of them for Police Officer in one email as you can see it in Exhibit # 99. In those incidents, Maziar Habibvand was provoked and manipulated by Niloofar Radgoudarzi.

Maziar Habibvand is close cousin of Ali Akbar Raefipoor who is one of the leader in IRGC (Islamic Revolutionary Guard Corps). You can see their picture in Exhibit # 100

Ali Akbar Raefipoor is one of the famous terrorist in Iran and as you can see in Exhibit # 101, there are so many pictures of him with Supreme Leader of Iran (Ayatollah Khamenehi) in google and Wikipedia.

In addition to it, Maziar Habibvand mentioned to this point that his grandfather (father of Maziar's dad) whose name is Iraj Habibvand was one of the headquarters in IRGC (Islamic Revolutionary Guard Corps). Maziar Habibvand mentioned that his grandfather (Iraj Habibvand) has hired Masoud Habibvand (Maziar's father) as well as Mehdi Radgoudarzi (Niloofar's father) in IRGC. You can see Iraj Habibvand's picture in Exhibit # 102 with Maziar Habibvand.

You can see Mehdi Radgoudarzi (Niloofar's father) and Masoud Habibvand (Maziar's father) together in their picture in Iran-Iraq war in Exhibit # 104 (second picture).

As we clarified for Police Officer in our email (in Exhibit # 99), Maziar Habibvand had serious argument with Saeid regarding Saeid's membership in Freemasonry. Maziar Habibvand saw Saeid's picture in Masons of California (Instagram account). You can see this picture in Exhibit # 103. After Maziar Habibvand saw this picture, he started to threaten Saeid several times. Maziar Habibvand forced Saeid to quit from freemasonry with this excuse that freemasonry is enemy with Iran but Saeid didn't quit.

In addition to Maziar Habibvand, other circles of Niloofar Radgoudarzi and her family who tried to hurt us several times through several ways and scenario are as below:

Najmeh Naziri, Yalda Riazi, Soheibe Jalali (Soodabeh), David Green, Rashid, Parham Namvar, Mojgan Habibvand, Nika Radgoudarzi, Fatemeh Mirbabazadeh (Soosan), Rezaeeyan, Hooman, Hengameh Hatami, Samira, Ghazal, Golkoo.

***Section VII) Mehdi Radgoudarzi's Retaliation (Losrios' Volunteer who is Niloofar's father)**

Mehdi Radgoudarzi was Losrios' volunteer. He had been introduced to me by Gregory McCormac (dean of biology department of FLC).

As you can see in Exhibit # 112, Mehdi Radgoudarzi has mentioned in page # 2 of his Resume/CV that he is volunteer assistant professor in Human Anatomy, Physiology & Cadaver Dissection Class in Folsom Lake College.

Mehdi Radgoudarzi also mentioned to my name (Dr. Seyed Saeid, Zamanieh Shahri) as well as my wife's name in the bottom of page # 2 and top of page # 3 of his Resume/CV in Exhibit # 112.

I have received his Resume/CV by his email (as you can see it in Exhibit # 113) because I helped him to become hired in CNSU (California Northstate University) College of Health as professor.

Mehdi Radgoudarzi had plan to get professor position. So, that's why Mehdi Radgoudarzi had started volunteering in both my classes and my wife's class (Dr. Sonia Sayyedalhoseini) since Fall 2019 to become familiar with teaching methods and performance.

As I clarified in section VI (Niloofar Radgoudarzi's Retaliation), we cut our communication with Niloofar Radgoudarzi because of her illegal, unethical and shameful suggestions/behaviors. But we continued our help to Mehdi Radgoudarzi. We didn't mention to Mehdi what was going on between us and Niloofar but Niloofar did.

***Some of Mehdi Radgoudarzi's Retaliations against us are as below (after cut our communication with her daughter):**

***1) Spreading and Distributing False, Fake, Fabricated, Forged and Altered Documents against us Between our Lab Students as well as Lodge's Members:**

After we cut communication with Niloofar, Mehdi Radgoudarzi the same as Niloofar, started to spread and distribute false, fake, fabricated, forged and altered documents against us since November 2019 between our colleagues, lab students and also the Lodge's members where Saeid is member.

Mehdi Radgoudarzi had taken those false, fake, fabricated, forged and altered documents from Hengameh Hatami (his cousin) because Niloofar (Mehdi's daughter) is one of the Hengameh Hatami's Circle.

As I clarified in section VI (Niloofar Radgoudarzi's Retaliation), Hengameh Hatami

was our former friend. Hengameh Hatami had so many **illegal, unethical and shameful requests** from us since in or around 2015 that we rejected her requests and cut our communication with her, then Hengameh Hatami had started retaliation against us by forging, altering and spreading **False, Fake, Fabricated, Forged and Altered** documents against us **among our residential neighbors, our close friends, our workplace, Federal Agencies and Iranian community to discredit us.** You can see the testimonies of some witnesses in Exhibit # 87.

Finally, when Hengameh Hatami became disappointed to discredit us, she committed to kill us in 4 distinct incidents through her circles. So, we filed 4 distinct lawsuits against her to get Civil Harassment Restraining Orders to save our lives.

Finally, as you can see in Exhibit # 91, the **Honorable Judge Deborah Lobre** in department # 1 of Superior Court of California after investigation, discovered several crimes and violations of Hengameh Hatami, **so the Honorable Judge Deborah Lobre, punished Hengameh Hatami with 4 Distinct Permanent Civil Harassment Restraining Orders in 2021 as you can see it in Exhibit # 91.**

As you can see in Exhibit # 92, Police Sherrif served Hengameh Hatami with 4 distinct Permanent Civil Harassment Restraining Orders.

Hengameh Hatami confessed on the hearing date in the Superior Court of California that Niloofar Radgoudarzi (Hengameh's cousin), took Hengameh to Gregory McCormac's office (Dean of biology department) in or around November 2019 and had met Gregory McCormac with Niloofar and shared with him those false, fake, fabricated and altered documents that she forged against us.

Hengameh Hatami also mentioned that Niloofar Radgoudarzi encouraged and motivated her to share those false, fake, fabricated and altered documents with Gregory McCormac.

These 4 distinct Permanent Civil Harassment Restraining Orders shows the severity of Hengameh Hatami's Violations and crimes. Hengameh Hatami appealed those 4 Permanent Civil Harassment Restraining Orders by hiring attorneys from Los Angeles and spent more than \$50,000.00 to break the restraining orders because she would like to continue her harassment against us.

Finally, as you can see in Exhibit # 93, on April 27th 2023, Three Honorable judges of 3rd Appeal District Court of California (Honorable Judge EARL, J., Honorable Judge ROBIE, Acting P. J. and Honorable Judge MCADAM, J.) affirmed those 4 distinct Permanent Civil Harassment Restraining Orders by investigation and evaluation of around **6000 pages** of documents which had been filed by charging parties.

As you can see in Exhibit # 95, the certification from Appeal division of Superior Court of California regarding the volume of documents related to those 4 cases which is **6000 pages** in **17 volumes**.

As you can see in Exhibit # 94, Police Sherrif served Hengameh Hatami with Appeal Court Decision which affirmed 4 Permanent Civil Harassment Restraining Orders.

***2) Mehdi Radgoudarzi's Participation in the Threatening Action against us:**

As I clarified in section VI (Niloofar Radgoudarzi's Retaliation), recently Mona Radgoudarzi who is cousin of Radgoudarzi family (Mehdi Radgoudarzi, Niloofar Radgoudarzi, Nika Radgoudarzi and Fatemeh Mirbabazadeh) threatened our lives seriously.

As I clarified in section VI (Niloofar Radgoudarzi's Retaliation), the last incident that Radgoudarzi family threatened our lives was on July 2023.

I had received a life-threatening call by **"What's app"** from someone who threatened me that if I mention to Niloofar Radgoudarzi's name or her father's name (Mehdi Radgoudarzi) in my Lawsuit against Losrios, I will be killed in USA and my family will be killed in Iran.

As you can see in Exhibit # 105 , this number belongs to Iran. So, I have saved this number as **"Suspicious person 1 who threatened us recently"**.

This life-threatening call has happened after that I had notified all Losrios and FLC administration on May 9th 2023 in advance that I will file a complaint against Losrios in district court during next 90 days from my DOJ federal lawsuit letter. You can see that prior notification in Exhibit # 115. Gregory McCormac (Niloofar Radgoudarzi's boyfriend) was on the Cc of that email.

Mehdi Radgoudarzi and also Niloofar Radgoudarzi became aware of my decision regarding federal lawsuit by Gregory McCormac. So, she started to threaten our lives through **suspicious person 1**.

When I saved the number of that person as **"Suspicious person 1 who threatened us recently"**, I figured out & discovered this point that the name of suspicious person 1 is **Mona Radgoudarzi**. As you can see in Exhibit # 106, the **Username** of that suspicious person 1 who threatened us is Mona Radgoudarzi in **"Telegram"**. That's why I discovered that she is threatening our lives behind Niloofar Radgoudarzi.

Even the suspicious person 1, has sent me some life-threatening messages on July 25th 2023 that you can see some of those in Exhibit # 107. Those life-threatening messages includes some pictures of our house (residential address), our work place address and our gym address in USA.

By considering this point that the suspicious person's phone number belongs to Iran, so the suspicious person 1 has received our information and the pictures of our house and work place through Radgoudarzi family (Mehdi Radgoudarzi, Niloofar Radgoudarzi, Nika Radgoudarzi, Fatemeh Mirbabazadeh).

As you can see in Exhibit # 107, the suspicious person 1 threatened our lives by the following statement:

"If you mention the names of Niloofar Radgoodarzi, Mehdi Radgoudarzi or Fatemeh (Susan) Mirbabazadeh in your complaint against the college , you will be hurt in the worst possible way in America . In addition to it , your family will be

killed in Iran . As you can see below , we have residential address of you in America as well as your family in Iran . We even found the address of your workplace and Gym in America . If you mention the names of the above people(Radgoudarzi Family) in your complaint , you will be killed in America wherever possible, in your workplace, Gym or your house . besides that , your family will be killed in Iran.”

In addition to it, as you can see in Exhibit # 107, the suspicious person 1 mentioned to my house address in USA (713 Stafford Street, Apt # 46 , Folsom CA 95630), my former work place address in USA (2910 Prospect Park Drive, Rancho Cordova CA 95670) and my gym address in USA (700 Oak Avenue Parkway, Folsom CA 95630).

By considering this point that the suspicious person's phone number belongs to Iran, so the suspicious person 1 has received our information and the pictures of our house and work place through Radgoudarzi family.

In this time, Radgoudarzi family has provoked and manipulated one of her cousin from outside of USA to protect her cousin from justice of United States because previously in 2021, one of Niloofar Radgoudarzi's cousin whose name is Hengameh Hatami (from inside the USA), tried to kill us and as you can see in Exhibit # 91, the superior court of California after investigation everything issued 4 distinct civil harassment restraining orders against her.

*** Some of Mehdi Radgoudarzi's Illegal, Unethical and Shameful Suggestions/Behaviors during his volunteering at Losrios:**

Mehdi Radgoudarzi (such as Niloofar Radgoudarzi and Fatemeh Mirbabazadeh) had some Illegal, Unethical and Shameful Suggestions Regarding his Money Laundering Circle for Bulk Cash Transferring to Regime of Iran by Breaking the United States Sanctions against Regime of Islamic Republics of Iran.

As I clarified in section VI (Niloofar Radgoudarzi's Retaliation), during our communication with Niloofar Radgoudarzi, she and her family (Mehdi Radgoudarzi who is Niloofar's father and Fatemeh Mirbabazadeh who is Niloofar's mother) had several illegal requests from us to join to Niloofar's money laundering circle for bulk cash transferring to Regime of Iran by breaking the United States sanctions against Regime of Islamic Republics of Iran.

As you can see in Exhibit # 80, in 2020, we reported the illegal offer of Niloofar Radgoudarzi and her family (Mehdi Radgoudarzi and Fatemeh Mirbabazadeh) to officers and investigators of ICE as well as Department of Homeland Security.

In addition to it, as you can see in Exhibit # 81, in 2020, we went to the Police Department to report their violations regarding bulk cash transferring to Regime of Iran by Breaking the United States sanctions against Regime of Iran.

As you can see in Exhibit # 82, Folsom Police Officer transferred our report to FBI for federal investigation.

As you can see in Exhibit # 83, in 2020, we had a meeting with some FBI officers regarding those aforementioned matters. On our meeting with FBI Officers, they asked us about some other violations of Radgoudarzi family which they may have received from others but we didn't know about it. So, we let the FBI officers know that we are not aware of those kind of violations.

Mehdi Radgoudarzi and his wife (Fatemeh Mirbabazade) have one company in Iran which name is " Parto Tabesh Mofid " . This Company registered with this number 351531. This Company is just a cover for their bulk cash transferring and also their money laundering to break the Sanctions of the United States of America against Regym of Iran.

Radgoudarzi Familly (Mehdi Radgoudarzi, Niloofar Radgoudarzi, Nika Radgoudarzi and Fatemeh Mirbabazadeh) are living in USA but they have so many representative instead of themselves in around the world to make their circle.

Amirhossein Radgoudarzi (cousin of Radgoudarzi family) in Tehran, **Milad Hatami** (cousin of Hengameh Hatami) in Turkey and Niloofar Bahadorifar in California, are the circle of Radgoudarzi family to Money Laundering for Bulk Cash Transferring to Regime of Iran by Breaking the United States Sanctions against Regime of Islamic Republics of Iran.

Amirhossein Radgoudarzi is Radgoudarzi family's representative in "Parto Tabesh Mofid" company in Tehran. Amirhossein is also a member of IRGC (Islamic Revolutionary Guard Corps) the same as Mehdi Radgoudarzi. IRGC is one of the known Terrorist groups of the Regim of Iran.

As you can see in Exhibit # 85, Milad Hatami who is one cousin of Hengameh Hatami had been arrested by Interpol Police Officers in 2021 because of his money laundering for Regime of Iran. Milad Hatami had committed with Niloofar Bahadorifar to break the sanctions of United States against Regime of Iran. You can see the report of Department of Justice regarding this matter in Exhibit # 86.

In addition to money laundering and bulk cash transferring for Regim's of Iran, another activity of Radgoudarzi's Company (Parto Tabesh Mofid) is regarding to nuclear medicine and radiology equipments.

Mehdi Radgoudarzi exports nuclear radiology medicine and material to Iran secretively through the Iranian passengers who travels to Iran. They also offer to people who wants to travel to Iran that if those Iranian people accept to transfer 20,000.00 Cash from U.S. to Iran, so they would pay 1000.00 \$ to them.

We also report any fraud which we see because as a person who loves United States, we feel responsible about United States. We believe in "we the people" and "Constitution of law".

As you can see in Exhibit # 114, Mehdi Radgoudarzi tried several times to contact with us but after his retaliation against us, we ignored all of his calls and text messages. As you can see in Exhibit # 114, we didn't answer his last text message.

In addition to it, as I clarified in section VI (Niloofar Radgoudarzi's Retaliation), Maziar's father was close friend of Mehdi Radgoudarzi (Niloofar's father). They were hired by IRGC (Islamic Revolutionary Guard Corps) which is one of the known Terrorist groups of the Regim of Iran.

You can see Mehdi Radgoudarzi (Niloofar's father) and Masoud Habibvand (Maziar's father) together in their picture in Iran-Iraq war in Exhibit # 104 (second picture).

We also report any fraud which we see because as a person who loves United States, we feel responsible about United States. We believe in "we the people" and "Constitution of law".

***Section VIII) Law Misconduct during EEOC Investigation by the
Influence of Losrios over EEOC Investigators (by Penetrating
Pathway) to Protect the Son of Their Former Dean from Justice
Punishment (Gregory McCormac's Father was a Former Dean in
ARC who Has Many Connections in Losrios Administration).**

As you can see in Exhibit # 96, on March 23rd 2022, I have clarified most violations of EEOC Supervisors and Investigators during investigation process to **Steven Hunt, Local Office Director in EEOC of Oakland and Other EEOC Directors in Oakland, San Francisco & Washington, D.C.**, by an official email in response to his email to me. Those violations have happened since 2020. Although after March 23rd 2022 till now, some other violations have also happened and may happen .

The Federal law has been violated several times purposely, intentionally and consecutively through Law Misconduct which has happened by some EEOC supervisors and investigators (Bryan Hoss, Dana Johansson and their Circle).

After we notified the agencies related to justice such as House Judiciary Committee, Senate Judiciary Committee, Headquarters of EEOC in Washington, D.C. regarding Bryan Hoss and Dana Johansson's Violations, so they became fired because of Law Misconduct which has happened by them during investigation Process and they are not EEOC employees anymore, but their circle who are still EEOC employees, try to misconduct investigation Process as well as prosecution pathway again, and this process is still ongoing.

It is a pity, shame and so sad to mention to this point that an independent agency such as EEOC (Equal Employment Opportunity Commission) which is responsible for investigation to determine discriminations, has some supervisors, Officers and investigators who misconduct the investigation process as well as prosecution pathway several times, purposely, intentionally and consecutively to cover Employer's violations (Losrios Community College District) against Employees (me as a victim).

On March 22nd 2022, I had received a call from Steven Hunt regarding my serious concerns about cut off my ability to upload my documents to EEOC Portal. It was a positive point that after in or around 2 years since I have filed my first charge (May 2020), some EEOC Officer feels responsible and follow my concerns up, regardless that it is being the side effect of Senator & Congressman's contact or changing the previous Directors of EEOC in Oakland & San Francisco (who were Bryan Hoss & Dana Johansson).

As you can see in Exhibit # 96 (in my email to Steven Hunt on March 23rd 2022), my

conclusion of our conversation with him which has happened through the phone one day before (on March 22, 2022 in or around 5:00 PM), was this point that Dana Johansson and Bryan Hoss, 2 EEOC Directors of Oakland and San Francisco, became fired because of **Law Misconduct** and their other violations against me during investigation and they are not EEOC employees anymore.

It could be either result of EEOC internal investigation which may happen by headquarters of EEOC in Washington, D.C. about their employees' violations or it would be appeared that EEOC is not a part of Dana Johansson, Bryan Hoss' strange and very worrying actions, because I've clarified most of Bryan Hoss, Dana Johansson & their circle's violations to House and Senate Judiciary Committee, Headquarters of EEOC in Washington, D.C., Congressman Ami Bera, Senator Feinstein & Vice President Senator Kamala Harris.

Nevertheless, it was a good news that Dana Johansson and Bryan Hoss are not EEOC employees anymore but as I mentioned and emphasized to Steven Hunt in my email response to him on March 23rd 2022, I notified Steven Hunt, Director of Oakland EEOC Office, and also other EEOC headquarters to be aware and careful about **Bryan Hoss and Dana Johansson's Circle** who are still EEOC employees in either Oakland or San Francisco and trying to misconduct judicial investigation to cover Employer's violations (Losrios) against Employees (me as a victim). **It could be either for influence of those Employers over investigators (Penetrating Pathway) or because of the investigator's discriminatory behaviors.**

As you can see it in Exhibit # 96, I kindly and respectfully recommended to all EEOC Directors of Oakland, San Francisco and Washington, D.C. who were at the Cc part of my email to Steven Hunt on March 23rd 2022, to read that email, line by line (from beginning till end) because I was sure that if they did it, so all of us could save time and energy and we would not see each other in the District Court before honorable Judge of District Court, but unfortunately, they did not.

I also mentioned in my email response to Steven Hunt on March 23rd 2022 (that you can see in Exhibit # 96), some persons on behalf of Niloofar Radgoodarzi (Gregory McCormac's girlfriend who was night shift lab tech in FLC), threatened us that if I mention to her name on my EEOC complaint or any other responsible agencies related to justice, she will kill us and recently I saw suspicious commuting around my house.

Finally, the severity and continuity of EEOC's violations led to filing complaint against them by me. As you can see in Exhibit # 9, I have filed my complaint against EEOC of Oakland and San Francisco on August 8th 2022 in Northern District Court of California with Court Case # 22-cv-03367-YGR.

The first strange, ridiculous, shameful, regrettable, weird and very worrying reaction of EEOC in response to my federal lawsuit against them was releasing the results of EEOC investigation for my first charge exactly 1 week after EEOC being served with my federal lawsuit against them!!!!!!!!!!!!!!:-)) Shame on Bryan

Hoss and Dana Johansson's Circle because of procrastinating this case so far.

As you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022**, **Losrios was known guilty in violation of Title VII of my Civil Rights on that**. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves** and **establishes** this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation** that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: **Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and ...**

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations** in **my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** against us as well.

The obvious law misconduct, violations and discrimination which have happened by Bryan Hoss and Dana Johansson's Circle, include:

- 1) **Illegal & Unlawful Changes in My EEOC Portal on January 2022**
- 2) **Freezing the Schedule for Interview regarding my New Inquiry (# 555-2022-00729) on February 2022**
- 3) **Cancellation the schedule of my interview, only 4 days before of my interview date with this excuse that I didn't confirm my appointment which was scheduled for 05-16-2022 while I did not receive any email from EEOC regarding confirmation.**
- 4) **Trying to Convert and Derail My 3rd Charge Statement from the Main Concept by Advising me Not to Mention to Law Misconduct by Dana Johansson & Bryan Hoss' Circle Otherwise My 3rd Charge Becomes Dismissed.**

- 5) Cutting off our ability to upload my documents in my portal on March 2022
- 6) Continuance of Losrios Violations in January 2022 which could be the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle.
- 7) Procrastination in Determination of Results of EEOC Investigation while these Case are so straightforward & there are so many violations and discrimination on that.
- 8) Bryan Hoss & Dana Johansson's strange and very worrying actions

***Part # 1 of Section C) Illegal & Unlawful Changes in My EEOC Portal on January 2022**

As you can see in the Exhibit # 116, I've sent an official email to Patrick Gheorghe who is investigator in my cases regarding **Illegal & Unlawful Changes in My EEOC Portal** on January 19, 2022. That email has one pdf file which includes 7 Exhibits and also 79 pages documents. I have clarified everything for him regarding Illegal and Unlawful Changes in my EEOC Portal.

This violation which has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees, includes deleting all of the documents which I had uploaded on my EEOC Portal as "Evidence from Witness Provide by CP" and it is obvious violation of EEOC Policy.

As you can see in Exhibit # 117, Patrick Gheorghe who is investigator in these cases, in his response to me, tried to bring this excuse and also pretend that the IT issues happened in my portal.

As you can see in Exhibit # 118 and also as I've clarified for Patrick Gheorghe, who is investigator in these cases, on January 27th 2022 in response to his excuse regarding IT issues, I clarified for him this point that IT issue is an unacceptable excuse for covering this obvious violation because the documents have not been deleted randomly and only the documents which I had uploaded on my EEOC Portal as "Evidence from Witness Provide by CP" have been deleted and it proves that it happened purposely and intentionally.

So, IT issue is an unacceptable excuse for covering this obvious violation regardless of happening by IT department or by Bryan Hoss & Dana Johansson's Circle.

As you can see in the Exhibit # 119 and also as I have clarified for Patrick Gheorghe on January 19, 2022, according to page # 8 (chapter 4.1) of "EEOC Public Portal User Guide Volume 8", it obviously and clearly mentioned that **An uploaded document cannot be deleted. (This sentence is dominated by underline in EEOC website)**

As you can see in the Exhibit # 120 and also as I have clarified for Patrick Gheorghe

who is investigator in these cases on January 19, 2022, based on my previous print of my EEOC Portal on 09-03-2021, you can see all of the documents which I had uploaded in my EEOC Portal of both my charges as **“Evidence from Witness Provide by CP”**.

In the bottom of all pages in Exhibit # 120, there are dates, time and also the EEOC website address. So, it shows and also proves that I have gotten those documents from my EEOC Portal. Those documents which I had uploaded include:

- **Our Serious Concerns Regarding Both Bryan Hoss & Dana Johansson’s strange & very worrying actions as 2 EEOC Supervisors**
- **Hereinafter Charge**
- **Our Communication with Senator Kamala Harris & Congressman Ami Bera**
- **Updated Losrios Violations Pathway**
- **Covering Violations by Losrios Administration**
- **Notifying Human Resource & Union Regarding Hiring New Adjunct Faculty**
- **New Adjunct Faculty Hired**

As you can see in the Exhibit # 121 and also as I have clarified for Patrick Gheorghe who is investigator in these cases, on January 19, 2022, based on my last print of my EEOC Portal on 01-19-2022, all of the above documents which I had uploaded on my EEOC Portal of both my charges as **“Evidence from Witness Provide by CP”**, have been deleted from my EEOC Portal, while as you can see in Exhibit # 119, according to page # 8 (chapter 4.1) of “EEOC Public Portal User Guide Volume 8”, it obviously and clearly mentioned that an uploaded document cannot be deleted. (This sentence is dominated by underline).

As you can see in the Exhibit # 121, in the bottom of all pages, there are dates, time and also the EEOC website address. So, it shows and also proves that I have gotten those documents from my EEOC Portal.

Deleting all of the documents which I had uploaded on my EEOC Portal as “Evidence from Witness Provide by CP” is obvious violation of EEOC Policy, regardless of happening by IT department or by Bryan Hoss & Dana Johansson’s Circle. IT issue is an unacceptable excuse for covering this obvious violation because the documents have not been deleted randomly and only the documents which I had uploaded on my EEOC Portal as “Evidence from Witness Provide by CP” have been deleted and it proves that it happened purposely and intentionally. So, IT issue is an unacceptable excuse for covering this obvious violation.

Since February 2022 that I have reported this Illegal & Unlawful Changes in My EEOC Portal, to Honorable Judge of District Court, the Senate Judiciary Committee and the House Judiciary Committee, then all of the documents which

were being deleted in my portal came back to my portal again.

I want to emphasize this point again that IT issue is an unacceptable excuse for covering this obvious violation because the documents have not been deleted randomly and only the documents which I had uploaded on my EEOC Portal as "Evidence from Witness Provide by CP" have been deleted and it proves that it happened purposely and intentionally.

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

***Part # 2 of Section C) Freezing the Schedule for Interview regarding my New Inquiry (# 555-2022-00729)**

I have submitted my new inquiry (# 555-2022-00729) regarding **Continuance of Losrios Violations which has happened on January 2022**. As you can see in the Exhibit # 122 and also as I have clarified for Patrick Gheorghe who is investigator in these cases, on January 19, 2022, the page of EEOC website which related to schedule an interview mentioned the following sentence:

"Currently, there are no appointments available."

As you can see in Exhibit # 122, none of the appointments were available till **August 26th 2022**.

As you can see in Exhibit # 123, Nancy A. Sienko, District Director in EEOC of San Francisco, on March 9th 2022, replied to Congressman Ami Bera regarding his inquiry about my serious concerns regarding EEOC violations and Law Misconduct.

As you can see in Exhibit # 124, **in complete disbelief**, on March 10th 2022, only one day after Nancy A. Sienko's response to Congressman Ami Bera, appointment became available for May 16th 2022 and we received the email notification for our interview date, while as you can see in Exhibit # 122, none of the appointments were available till August 26th 2022!!!!!!

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

***Part # 3 of Section C) Cancellation the schedule of my interview, only 4 days before of my interview date with this excuse that I didn't confirm my appointment which was scheduled for 05-16-2022 while I did not receive any email from EEOC regarding confirmation.**

As you can see in Exhibit # 125, I have received one email from EEOC with this title: **"Notice of Cancelled Interview for EEOC Inquiry 555-2022-00729"**. The concept of that email includes:

"On 05/09/2022 you were sent an email asking you to confirm your appointment on 05/16/2022 at 12:30 PM PDT for a phone interview with a representative of the EEOC. Because you did not confirm your appointment, your scheduled interview has been canceled. You must complete an interview if you want EEOC to take further action on your inquiry (555-2022-00729). To reschedule your interview, sign in to the EEOC Public Portal and choose Schedule an Interview."

As you can see in Exhibit # 126, the only email which I had received from the EEOC after I scheduled for interview, was **on April 18th 2022**, which was a **Reminder of Scheduled Interview for EEOC Inquiry**. Except this email, I did NOT receive any other emails.

As you can see in Exhibit # 127, in the response to the above email, I have sent one email to my investigator Patrick Gheorghe and also have placed 18 responsible persons and agencies on the Cc part of that email. This email includes the following statement:

"Dear Patrick Gheorghe, Investigator of EEOC, Greetings the day. As you can see in the following email which has been attached at the end of this email, this morning, I have received Notice of cancelled my interview with this excuse that I didn't confirm my appointment on 05/16/2022 since I have NOT received any email from EEOC regarding confirmation, at all, never ever. I believe this is another strategy of Bryan Hoss and Dana Johnson's circles to procrastinate my cases. I want to kindly and respectfully ask you keep my appointment on 05/16/2022 as I had scheduled it before because as I mentioned above, I didn't receive any email of EEOC regarding confirmation, at all, never ever. I will report this violation to responsible agency as well as honorable judge of District court. I am looking forward to hear back from you as soon as possible. *Best Regards,*

Prof. Dr. Sonia Sayyedalhosseni, M.D.

Victim of Not only Losrios Discrimination but Also Violations of Bryan Hoss & Dana Johansson's Circle"

As you can see in Exhibit # 128, after my kindly, respectfully and seriously Notice to Patrick Gheorghe, **in complete disbelief**, I have received emails from both EEOC of Washington as well as EEOC of Oakland regarding Notice of Schedule Interview. So, after our serious notice to all of them, our interview appointment for May 16th 2022 regarding our 3rd Charge came back.

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan

Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

***Part # 4 of Section C) Trying to Convert and Derail My 3rd Charge Statement from the Main Concept by Advising me Not to Mention to Law Misconduct by Dana Johansson & Bryan Hoss' Circle Otherwise My 3rd Charge Becomes Dismissed.**

On 05-16-2022, I had interview regarding my 3rd Charge # 555-2022-00729 with Malinda Tuazon.

As you can see in Exhibit # 129, at the end of interview, based on Malinda's request I have sent my statement regarding my 3rd Charge # 555-2022-00729 to her for prevention of missing any item.

Per my conversation with Malinda Tuazon on interview date, she told me if I mention to names of Bryan Hoss and Danna Johnson's circle (which I had mentioned to them at the end of my statement regarding Charge # 555-2022-00729), EEOC won't investigate my 3rd charge, so she advised and recommend me to let her to change my charge's statement in a way which would be investigated but I disagreed with her offer and rejected her offer immediately.

You can see my signed charge # 555-2022-00729 in Exhibit # 55.

Per my husband's conversation with Thea Galli on interview date, she told him if he mention to names of Bryan Hoss and Danna Johnson's circle (which he had mentioned to them at the end of his statement regarding Charge # 555-2022-00730), EEOC won't investigate his 3rd charge, so she advised and recommend him to let her to change his charge's statement in a way which would be investigated and at first my husband trusted her and agreed with her offer but when my husband (Prof. Dr. Seyed Saeid, Zamanich Shahri) received the charge to sign it electronically, he became shocked and surprised because Thea Galli who interviewed with him regarding his 3rd charge # 555-2022-00730, had converted and changed the matter as well as the concept of his statement's complaint completely but after he protested to Thea Galli, and she returned his real statement back for electronic signing.

As you can see in Exhibit # 130, my husband (Prof. Dr. Seyed Saeid, Zamanich Shahri) kindly, respectfully and seriously let Thea Galli know that she should be cautious so that Danna Johnson and Bryan Hoss' circle could not take advantage of her to misconduct his complaint process as they did so far.

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

***Part # 5 of Section C)** cutting off our ability to upload my documents in my portal on March 2022

On March 2022, I figure it out that I am not being able to upload any kind of documents in my EEOC portal, although I have tried to do so with different laptop, home computer, PC, etc.... and with different browsers including chrome, Firefox, safari, Microsoft Edge and etc.....

As you can see in the Exhibit # 131, on 03-21-2022, I have sent one request to EEOC to give me back the ability to upload documents in my portal that is my obvious right.

As you can see in Exhibit # 132, I have uploaded some files as big as 20 Mb in my EEOC portal previously, for example my Hereinafter Charge which is rebuttal and opposition to Losrios 2nd position statement regarding Case # 555-2021-00521 was around 20 Mb.

As you can see in Exhibit # 133, I've tried several times via several devices as well as several browsers to upload my documents which is around 2 or 3 Mb but I could not.

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

***Part # 6 of Section C)** Continuance of Losrios Violations in 2022 which could be the result of both Bryan Hosrs and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle.

As you can see in Exhibit # 134 and also as I've clarified for Patrick Gheorghe who is investigator in these cases, on January 18, 2022, I have sent an official email to Patrick Gheorghe, regarding New Inquiry (# 555-2022-00729) on January 18, 2022. That email has one pdf file which includes 9 Exhibits and also 47 pages documents.

Continuance of Losrios Violations which is happening in 2022 (currently) is hiring 2 other NEW adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for in person classes which belonged to us before, while both of those classes are on ground (in person) not online.

As you can see in Exhibit # 53 and also as I have clarified for Patrick Gheorghe who is investigator in these cases, on January 18, 2022, the **FLC class schedule website** was on **TBA status** but as you can see in Exhibit # 54 and also as I have clarified for Patrick Gheorghe who is investigator in these cases, since 01-15-2022, TBA changed to **2 New names of faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh)**

As you can see in Exhibit # 19 and also as I have clarified for Patrick Gheorghe who is investigator in these cases, on January 18, 2022, it is another proof that the excuse of Peter Khange, Director of human resource in Losrios on October 17th 2020,

regarding online teaching experience of Dr. Heather Roberts (who was hired instead of us for Fall 2020 exactly after that we filed complaint against Gregory McCormac) were just covers to hide their retaliation and violations against us.

As you can see in Exhibit # 18 and also as I have clarified for Patrick Gheorghe who is investigator in these cases, on January 18, 2022, It is also another proof that **the excuse of Monica Pactol, Vice President of FLC on May 14th 2020, regarding course reduction in COVID-19 situation that affected on our termination, were just covers to hide their retaliation and violations against us, although they proved it before by:**

- 1) Ignoring our several notifications in advance on summer 2020 according to changes in FLC Class Schedule website regarding hiring new adjunct faculty for fall 2020 instead of us (Dr. Heather Roberts) by Gregory McCormac (Dean of Science Department)
- 2) Hiring new adjunct faculty instead of us for fall 2020 (Dr. Heather Roberts)
- 3) Cut off our access to our outlook emails, proofs and evidences in or around Feb 2021

And by hiring 2 New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), they have proved this point that all their excuses regarding course reduction in COVID-19 situation (Monica Pactol's Excuse, Exhibit # 18) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse, Exhibit # 19) were only excuses to cover their retaliation & violations against us.

As you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022, Losrios was known guilty in violation of Title VII of my Civil Rights on that.** So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves** and **establishes** this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation** that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: **Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation**

submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and ...

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations** in **my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** as well.

As you can see in Exhibit # 56, according to EEOC's policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the same position that he/she would have been if the discrimination had never occurred but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

We have too much serious concerns that both Bryan Hoss and Dana Johansson's strange and very worrying actions and also their circle who are still EEOC employees, regarding our cases, affected on Losrios behavior and Losrios becomes too rude that they hire 2 new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for Spring 2022 (in person classes) while Losrios is under ongoing investigations by EEOC which shows and proves the continuance of their violations and also rebuts their previous excuses.

When Bryan Hoss, Dana Johansson as 2 EEOC Directors and also their circle had strange and very worrying actions and also, they have Law Misconduct several times purposely and intentionally, so who can stop Losrios violations????!!!!!!!!!!!!!!

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

***Part # 7 of Section C) Intentional Procrastination in Determination of Results of EEOC Investigation while these cases are so straightforward and there are so many violations, discrimination and Law Misconduct on that.**

I have sent "Hereinafter Charges" to rebut and reject Losrios Position Statements before the due date which was determined by EEOC.

My "Hereinafter Charge" regarding case # 555-2020-01235 includes 302 pages.

My "Hereinafter Charge" regarding case # 555-2021-00521 includes 382 pages.

I've signed my Charge regarding 1st Case on 09-10-2020 (18 months ago) and also, I've signed my Charge regarding 2nd Case on 02-04-2021 (13 months ago).

I know there's no time limit for investigation but it is so strange and weird that much of Procrastination in Determination of Results of EEOC Investigation while these Case are so straightforward and there are so many violations and discrimination on that.

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

Before everything, I've clarified all the following statement with the details as well as strong proofs and Exhibits in Section B of this statement which is Violations of Employer (Losrios Community College District, LRCCD & Folsom Lake College, FLC). But , I want to squeeze it because I want to prove Intentional Procrastination in Determination of results of EEOC investigation which has happened by EEOC while these cases are so straightforward and there are so many violations, discrimination & Law Misconduct on that. I have clarified everything with details, strong proofs and Exhibits in Section B.

I had participated in a protected activity and had filed complaint against dean of FLC in our union as well as EEOC on spring 2020, but 1 month after EEOC gave me lawsuit letter against Losrios and also couple days after the result of Losrios internal biased investigation came up, I was laid off by Gregory McCormac without any explanation **while I was starting to file the lawsuit against Losrios BUT because I was laid off by Gregory Retaliation in May 2020, so I couldn't afford to pay the lawyer anymore and my lawsuit filed against Losrios was discounted.**

I was hired by the Respondent in or around August 8, 2018. My job title upon hire was Adjunct Faculty and Professor in Human Anatomy and Physiology. My immediate supervisor was Gregory McCormac, Dean.

On six occasions, I was subjected to sexual harassment by Greg McCormac, Dean of the Biology Department. More specifically, on October 29, 2018, October 23, 2019, and November 5, 2019, Mr. McCormac made an unwanted sexual advance to me.

I declined his sexual advances each time. In or around January 2019, I requested to be transferred to another location from FLC main campus in Folsom to FLC Eldorado center, while since 2015 I live in Folsom and according to my availability form FLC main campus was my priority always because on that time I didn't have car.

I no longer felt comfortable working at the same facility as Mr. McCormac in main campus because of the sexual harassment. At first Gregory McCormac rejected my transfer request but after he saw I am so serious, finally my transfer request was approved. On two more occasions in late 2019, Mr. McCormac asked me whether I

have considered his advances.

Finally, I made my decision, so in January 2020, I complained about sexual harassment to the Respondent's Human Resources Department and to my union. My husband Dr. Seyed Saeid Zamanieh Shahri filed a distinct complaint against Gregory because my husband has been subjected/targeted to harassment and discriminatory terms/conditions of employment by Dean of Biology Gregory McCormac because of both my rejection about Greg's harassment as well as Niloofar Radgoudarzi's influence (Greg's girlfriend which was the FLC night shift Lab tech).

An internal investigation ensued. Subsequently, on or about March 11, 2020, I filed EEOC Chg. 555-2020-00834C, Sonia Sayyedalhoseini v. Los Rios Community College District. On March 23, 2020, I was issued a Notice of Right to Sue by the EEOC. On or about May 01, 2020, the Respondent completed its internal investigation **which was so biased and it was just to protect the son of former Dean (Gregory McCormac's father was the former Dean in Losrios)** and found that my allegations could not be substantiated.

On or about May 21, 2020, I was laid off. Gregory McCormac didn't give me any reason for my termination. After I followed it up with Monica Pactol (Vice President of FLC), she told me the reason for my layoff was that there was a course reduction related to COVID-19 situation.

Monica Pactol (Vice President of FLC), brought this excuse that **COURSE REDUCTION** regarding to **COVID-19 situation** affected on both of us for Fall 2020 assignment **BUT they hired NEW adjunct faculty (Dr. Heather Roberts) instead of us for the 2 distinct courses that we had taught before.**

Prior to my laid off, my performance was satisfactory in both online and on ground, according to email feedback and student survey.

Also, **NONE** of the adjunct faculties in Human Anatomy & Physiology department in FLC (such as Michelle Lee, Osario or Kamran Shoaci) had online teaching experience more than us. I notified all FLC and Losrios Administration regarding this violation but they mentioned that COVID-19 situation affected on our termination, not Gregory McCormac's retaliation.

After a while, I notified all FLC and Losrios Administration **again** regarding new violation which were happening by Gregory McCormac (hiring adjunct faculty instead of us) for fall 2020 while they already have mentioned that they have course reduction related to COVID-19 situation but they were hiring new adjunct faculty.

After hiring **NEW** adjunct faculty by Gregory McCormac (Dr. Heather Roberts) which happened on August 2020, I protested **again and again several times** to **all FLC and Losrios administration** that this obvious violation which I already had notified all them since summer 2020 according to FLC class schedule website, finally has happened in front of their eyes while I had notified all them regarding this violation **BEFORE** (since summer 2020) and they could stop it, but they did **NOT**

because Gregory McCormac is son of their former Dean (Gregory McCormac's father was their former Dean in ARC and has lots of connections with FLC and Losrios administration members).

I had placed most of the FLC and Losrios administration members who were involved in my cases in Cc part of most emails such as:

King Brian (Chancellor of Losrios);

Jacob Knapp (Leadership Line Member of Losrios)

Peter Khang (Director of Human Resource of losrios)

Whitney Yamamura (President of Folsom Lake College)

Monica Pactol (Vice President of FLC & Direct Supervisor of Greg)

Gregory McCormac (Dean of Science in FLC)

Niloofar Radgoodarzi (Gregory McCormac's Girlfriend who was Night Shift Lab Tech)

Robert Perrone (Executive Director of Union)

James Telles (FLC union member)

So, all of the above FLC and Losrios Administration participated in this violation because Gregory McCormac is son of their former Dean (Gregory McCormac's father was their former Dean in ARC and has lots of connections with FLC and Losrios administration members).

Accordingly, on or about September 10, 2020, I filed EEOC Chg. 555- 2020-01235C, Sonia Sayyedalhoseini v. LOS RIOS COMMUNITY COLLEGE DISTRICT. This charge includes allegations of retaliation related to my primary EEOC Charge of Discrimination. This charge is open and under investigation.

While this charge was under the investigation, I have been displaced from work, **but I remained an employee in the Respondent's database (confirmed via the respondent's position statement, in Page 4 & 5, in response to EEOC Question 6, dated November 25, 2020, in which the employer acknowledges that there is no evidence about my termination and I am currently employee.).**

On or about January 30, 2021, I discovered that my access to my work e-mail address had been rescinded while all of my documents, proofs, email records and evidence was in my Losrios email. When I contacted the Respondent (Losrios) to clarify why I could not access my work e-mail, I was advised that I was not showing up as an employee in their database **(that is contrary to what they already have mentioned in their Position Statement regarding Charge # 555- 2020-01235C).** By restricting my access to my e-mail, I have been cut off from my evidence, proofs, email records and documents that I need to support my EEOC charges of discrimination.

I signed a new Charge # 555-2021-00521 on 02 /04/ 2021 with EEOC. The respondent

repeated their previous excuse that they had mentioned in their first Position Statement. The respondent also mentioned again this point in their 2nd position statement regarding Charge # 555-2021-00521, in Page 4 & 5, in response to EEOC Question 6, dated March 15, 2021 in which the employer acknowledges that there is no evidence about my termination and I am currently employee.

As you can see in Exhibit # 49 and also Exhibit # 50 Losrios mentioned on their both position statements that Dr. Sayyedalhosseini is currently employee. The strangest thing, is that contrary to what Losrios mentioned on page 4 & 5 of both their position statements, (in response to Question#6 of EEOC) that Dr. Sonia Sayyedalhosseini is currently employees but they cut off my access to outlook account.

I also know at least 4 adjunct faculty who discontinued their positions as adjunct in or around 2016 (without filing complaints against Losrios) but they still have access to their emails and canvas.

As you can see in the Exhibit # 118, I've sent an official email to Patrick Gheorghe who is investigator in my case regarding those 4 witnesses on January 27, 2022 and clarified for Patrick Gheorghe this point that I have contacted with those four adjunct faculties who discontinued their positions but still have access to their emails and canvas. None of them allowed me to share their information with EEOC because firstly they are afraid of retaliation by Losrios. Ssecondly, they don't trust EEOC either. I respect to their privacy and their concerns make sense for us.

As you can see in the Exhibit # 53, the FLC class schedule website was on TBA status in the beginning of January 2022, but as you can see in the Exhibit # 54, on 01-15-2022, TBA status changed to **2 new names of faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh).**

These 2 classes are in person classes (on ground) and were the same courses that I have taught before and it is another evidence which proves this point that the excuse of **Peter Khange, Director of human resource in Losrios, regarding online teaching experience of Dr. Heather Roberts which led to hire her instead of me for Fall 2020 (exactly after I filed complaint against Gregory McCormac), were just covers to hide their retaliation and violations against me.**

It is also another evidence which proves this point as well that the excuse of **Monica Pactol, Vice President of FLC, regarding course reduction in COVID-19 situation that affected on our termination in May 2020, was also another excuse to cover and hide their retaliation and violations against me.**

And by hiring New adjunct faculties instead of us for Spring 2022 for in person classes (Rahman Ferdosi & Abigail Analeigh), Respondent have proved this point completely that all their excuses regarding course reduction in COVID-19 situation

(Monica Pactol's Excuse) or Dr. Heather Roberts' online experience in teaching (Peter Khange's Excuse) were only excuses to cover and hide their retaliation and violations against me.

As you can see in Exhibit # 1, in the results of EEOC investigation of my first charge # 555-2020-01235 which came up on **August 23rd 2022**, **Losrios was known guilty in violation of Title VII of my Civil Rights on that**. So, this violation is in continuance with their previous violations.

The results of EEOC investigation of my 1st charge # 555-2020-01235 **proves** and **establishes** this point that Losrios' decision to not to give assignments to us, **was a result of our complaints against them, NOT other irrelevant, strange, ridiculous, shameful, regrettable, weird and very worrying excuses, accusations, misinformation and disinformation** that they brought in their Position Statements.

The results of EEOC investigation of my 1st charge # 555-2020-01235 also **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: **Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) and ...**

Considering this point that **more than 99%** of the **concept of all Losrios' Position Statements** regarding **my 1st, 2nd and 3rd charge** are **exactly the same** (copy paste from each other if you compare them line by line), so **all of the same accusations in my 2nd & 3rd charge** are **False, Fake and Fabricated claims/reports** as well.

As you can see in Exhibit # 56, according to EEOC's policy, whenever discrimination is found by EEOC, the goal of the law is to put the victim of discrimination in the same position that he/she would have been if the discrimination had never occurred but in this case not only it didn't happen but also it led to continuance of Losrios violations by hiring those 2 new adjunct faculties instead of us for in person (on ground) classes in Spring 2022 which is the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle (Patrick Gheorghe).

Continuance of Losrios Violations which is happening in 2022 (currently) is hiring 2 other new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for in person classes while both of those classes are on ground (in person) not online. The continuance as well as repetition of Respondent's

violations could be the result of both Bryan Hoss and Dana Johansson's strange and very worrying actions as 2 EEOC Supervisors as well as their circle who had Law Misconduct several purposely and intentionally.

We have too much serious concerns that both Bryan Hoss and Dana Johansson's strange and very worrying actions and also their circle who are still EEOC employees, regarding our cases, affected on Losrios behavior and Losrios becomes too rude that they hire 2 new adjunct faculties instead of us (Rahman Ferdosi & Abigail Analeigh) for Spring 2022 (in person classes) while Losrios is under ongoing investigations by EEOC which shows and proves the continuance of their violations and also rebuts their previous excuses.

When Bryan Hoss, Dana Johansson as 2 EEOC Directors and also their circle had strange and very worrying actions and also, they have Law Misconduct several times purposely and intentionally, so who can stop Losrios violations???!!!!!!!!!!!!!!

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

And , Losrios has added another violation against me on its records which is hiring 2 new adjunct faculties who were not on FLC and they did not teach in FLC before at all. Never Ever. (Rahman Ferdosi & Abigail Analeigh)

At the end, Bryan Hoss, Dana Johansson and their circle who are still EEOC employees should know here is not a land of king or queen and nobody can take advantage of his/her position to do discrimination. Here is United States of America, the Land of Liberty and Justice for everyone, for ever and ever.

This violation has happened by Bryan Hoss and Dana Johansson's Circle who are still EEOC employees. Please be careful and be aware about them. Bryan Hoss and Dana Johansson's Circle who are still EEOC employees have to know this point that they will be punished by U.S. District Court because of their Violations as well as the Law Misconduct.

I will follow my right through either U.S. District Court, Ninth Circuit Court, Supreme Court, House Judiciary Committee, Senate Judiciary Committee, White House, Media, Newspapers or Wherever that I can follow my right. And in my way, I am hopeful to the justice of law.

***Part # 8 of Section C) Bryan Hoss & Dana Johansson's strange and very worrying actions**

First of all, we appreciate a lot for all EEOC officers' attention, consideration, and help and support.

Since 05-16-2020 that we started the process to open a charge against Losrios (Charge # 555-2020-01235), Bryan Hoss (one of the EEOC Officers) started strange behaviors and very worrying actions.

As you can see in Exhibit # 35 & Exhibit # 42 (Email # 50 to # 68), during our communication with Losrios and FLC administration regarding their violations, we had placed Bryan Hoss and Micheal Hourani as 2 EEOC Officers in the cc part of those above emails to let the EEOC Officers know what's going on between us and Losrios administration.

Since May 2020 that Losrios terminated us, Bryan Hoss had so many unacceptable behaviors, strange and very worrying actions on our cases which some of them include:

1) After Losrios hired new adjunct faculty instead of us for fall 2020 (Dr. Heather Roberts), Bryan Hoss several times did his best to dissuade us from filing new charges against Losrios by giving this offer to us and encourage us that he can give us Lawsuit letter but each time we rejected his offer.

2) As you can see in Exhibit # 135, since September 2020, he also continued his behavior for example in interview date regarding charge # 555-2020-01235, Bryan Hoss asked from Saeid and Sonia to interview them together but during interview, he interrupted Saeid and Sonia so many times while it was our right to have distinct and separate interview from each other because firstly, our charge numbers were completely different (Sonia's Charge # 555-2020-01235 and Saeid's Charge # 555-2020-01236). Secondly, we got 2 different appointments for interview.

3) During our communication regarding our charges with other EEOC Officers, we placed Bryan Hoss on the Cc part of our emails. We put him in the loop because we would like to let him know what's going on between us and other EEOC Officers but since in or around October 2020 which our charges transferred to investigation unit, Bryan Hoss seriously let us know that because our cases transferred from his unit to other responsible units, so **DO NOT** put him in the Cc of our emails.

4) Finally, as you can see in Exhibit # 136, he attached **AGAIN** the lawsuit letter of DFEH regarding my charge # 555-2020-01235 & Saeid's Charge # 555-2020-01236 while:

- The DFEH lawsuit letter was already attached in our portal and by placing it **AGAIN** in our portal, Bryan Hoss wanted to transfer this code to his circle that Sonia and Saeid have DFEH lawsuit letter and they can lawsuit by themselves.
- Bryan Hoss mentioned to us that our cases transferred from his unit to other responsible units.
- In response to his offer for giving us lawsuit letter, we clarified for Bryan Hoss that we don't want lawsuit letter on that time because Losrios terminated us and we could not afford the lawyer's fee on that time and we didn't have money.

As you can see in Exhibit # 137, at first, we shared our serious concerns about Bryan Hoss' strange and very worrying actions, with Dana Johansson (direct supervisor of Bryan Hoss), but Dana's explanation was not acceptable as well.

Bryan Hoss' strange and very worrying actions led to make serious concerns for us. So, we have shared **only our serious concerns about Bryan Hoss' strange and very worrying actions.** with the following persons and organizations (because according to the U.S. Constitution of Law, we believe in check and balance):

1) EEOC of Washington D.C. at 131 M Street, NE Washington, DC 20507 through the 4 following incident numbers:

Incident # 1: 210322-000002

Incident # 2: 210322-000003

Incident # 3: 210322-000167

Incident # 4: 210322-000177

2) The U.S. Senate Judiciary Committee at 224 Dirksen Senate Office Building Washington, DC 20510

3) The House Judiciary Committee at 2138 Rayburn House Office Building Washington, D.C. 20515

4) The U.S. Department of Justice at 950 Pennsylvania Avenue, NW Washington, DC 20530-0001

5) Commission on Judicial Performance at 455 Golden Gate Avenue, Suite 14400 San Francisco, California 94102

As you can see in the top of the first page in Exhibit # 138, Losrios 2nd position statement regarding Saeid's charge # 555-2021-00520 & Sonia's Charge # 555-2021-00521 submitted to EEOC on March 15th 2021. But as you can see in Exhibit # 139, we received it on July 12th 2021 (**after 4 months delay!!!**) while as you can see in the top of the first page in Exhibit # 140, Losrios 1st position statement regarding Sonia's Charge # 555-2020-01235 & Saeid's Charge # 555-2020-01236 which had submitted to EEOC on November 25th 2020 had been submitted to us on December 1st 2020 (**only after 4 days**). So, this too much difference didn't make sense at all.

Finally, as you can see in Exhibit # 141 (Bryan Hoss' email) and Exhibit # 142 (Dana Johansson's email), we figured it out that both of them became fired and they are not EEOC employees anymore. So, that too much delay (**4 months delay**) which is mentioned above finally made sense for us.

We found out Bryan Hoss and Dana Johansson were under the EEOC investigation by the force of those agencies which had received our reports about the Law Misconduct that happened by Bryan Hoss and Dana Johansson. Those agencies include: EEOC of Washington D.C., The U.S. Senate Judiciary Committee, The House Judiciary Committee, The U.S. Department of Justice, Commission on Judicial Performance.

As you can see in Exhibit # 96 (in my email to Steven Hunt on March 23rd 2022), my conclusion of our conversation with him which has happened through the phone one

day before (on March 22, 2022 in or around 5:00 PM), was this point that Dana Johansson and Bryan Hoss, 2 EEOC Directors of Oakland and San Francisco, **became fired** because of **Law Misconduct** and their other violations against me during investigation and they are not EEOC employees anymore.

It could be either the result of EEOC internal investigation which may happen by Headquarters of EEOC in Washington, D.C. regarding their employees' violations or it would be appeared that EEOC is not a part of Dana Johansson and Bryan Hoss' strange and very worrying actions, because I have clarified most of the Bryan Hoss, Dana Johansson & their circle's violations to **House and Senate Judiciary Committee, Headquarters of EEOC in Washington, D.C., Congressman Ami Bera, Senator Feinstein and Vice President Senator Kamala Harris.**

Nevertheless, it was a good news that Dana Johansson and Bryan Hoss are not EEOC employees anymore but as I mentioned and emphasized to Steven Hunt in my email response to him on March 23rd 2022, I notified Steven Hunt, Director of Oakland EEOC Office, and also other EEOC headquarters to be aware and careful about **Bryan Hoss and Dana Johansson's Circles** who are still EEOC employees in either Oakland or San Francisco and trying to misconduct judicial investigation to cover Employer's violations (Losrios) against Employees (me as a victim). It could be either for influence of those Employers over investigators (Penetrating Pathway) or because of the investigator's discriminatory behaviors.

As you can see it in Exhibit # 96, **I kindly and respectfully recommended to all EEOC Directors of Oakland, San Francisco and Washington, D.C. who were at the Cc part of my email to Steven Hunt on March 23rd 2022, to read that email, line by line (from beginning till end) because I was sure that if they did it, so all of us could save time and energy and we would not see each other in the District Court before honorable Judge of District Court, but unfortunately, they did not.**

The Federal law has been violated several times purposely, intentionally and consecutively through Law Misconduct which has happened by some EEOC supervisors and investigators (Bryan Hoss, Dana Johansson and their Circle).

After we notified the agencies related to justice such as House Judiciary Committee, Senate Judiciary Committee, Headquarters of EEOC in Washington, D.C. regarding Bryan Hoss and Dana Johansson's Violations, so they became fired because of Law Misconduct which has happened by them during investigation Process and they are not EEOC employees anymore, but their circle who are still EEOC employees, try to misconduct investigation Process as well as prosecution pathway again, and this process is still ongoing.

It is a pity, shame and so sad to mention to this point that an independent agency such as EEOC (Equal Employment Opportunity Commission) which is responsible for investigation to determine discriminations, has some supervisors, Officers and investigators who misconduct the investigation process as well as prosecution pathway several times, purposely, intentionally and consecutively to

cover Employer's violations (Losrios Community College District) against Employees (me as a victim).

It could be either for influence of those Employers (Losrios) over investigators (by Penetrating Pathway) to protect the son of their former Dean from the justice punishment (Gregory McCormac's father was a former Dean in ARC who has many connections in Losrios Administration) or because of the investigator's discriminatory behaviors as well as Law Misconduct which has happened with any motivation.

In addition to it, some EEOC supervisors as well as their circle as Law Agents and also Losrios Community College District as Discriminators have committed an especially malicious or reckless act of discrimination and violation against me during the investigation process **which led to so many side effects in my life** as you can see some of them in Exhibit # 143; **such as emotional harm, mental anguish, inconvenience, and loss of enjoyment of life, Mental distress, physical pain, loss of sleep, stress incontinency, marital / family strain, loss of self-esteem, excessive fatigue, ulcers, tension headaches with visual effects, stress vitiligo, General Anxiety Disorder (GAD), Major Depressive Disorder (MDD), Post Traumatic Stress Disorder (PTSD), sleep disorder and nightmares, restless leg syndrome, gastrointestinal syndrome, phobia and panic reaction, lack of appetite, humiliation, injury to reputation, feeling anger, frustrated, self-blame insane** and etc., that I have suffered in the last 3 years ago and also, I am still suffering.

Bryan Hoss, Dana Johansson as 2 EEOC Supervisors, their circle who are still EEOC employees and Losrios Community College District should know, here is not a land of king or queen and nobody can take advantage of his/her position to do discrimination or violation of Federal law, never ever. Here is United States of America, the Land of Liberty and Justice for everyone, for ever and ever.

***Section IX) Conclusion of “Statement of Facts, Claims & Complaint”**

This is Professor Dr. Sonia Sayyedalhosseini, the recipient of the prestigious **“Gold-Level President’s Medal Award”** as you can see it in Exhibit # 3. I am victim of several violations of Losrios Community College District.

This complaint is against Losrios Community College District as well as Folsom Lake College (as one branch of Losrios) regarding **EEOC Charge # 555-2020-01235**.

You can see **EEOC investigation results** about the above charge in Exhibit # 1 and you can find Department of Justice’s Lawsuit Letter (**DOJ Lawsuit Letter**) in Exhibit # 2 which was issued on May 9th 2023 regarding **EEOC Charge # 555-2020-01235**.

Most of the Losrios Community College District’s violations regarding **Charge # 555-2020-01235** already have been investigated by U.S. Equal Employment Opportunity Commission (EEOC) and as you can see in Exhibit # 1, the EEOC investigation result (EEOC Determination Letter) regarding **Charge # 555-2020-01235** **proves** and **establishes** this point that **Losrios Community College District is guilty in violation of Title VII of my Civil Rights**.

So, the concept of this statement as well as its Exhibits are for further clarification otherwise these were already investigated by EEOC.

You can see the **“Table of Contents”** which has been attached to the beginning of this complaint for further clarification about the concept of my statement.

As you can see in Exhibit # 1, on the **third paragraph** of EEOC Investigation Result Letter, EEOC Director on behalf of commission mentioned to the following results:

“I have **considered all the evidence** disclosed during the investigation and have determined that **there is reasonable cause to believe that Respondent did not assign Charging Party courses for the Fall 2020 semester and laid her off from employment in retaliation for engaging in protected activity, in violation of Title VII.**”

The EEOC Determination Letter regarding **Charge # 555-2020-01235** **proves** this point that on the results of EEOC investigation, **Losrios Community College District was known guilty in violation of Title VII of my Civil Rights**.

This EEOC Determination Letter **proves** and **establishes** another point that **all the accusations, misinformation and disinformation** on Losrios Position Statements which has been given to EEOC for investigation, are **False, Fake and Fabricated** claims/reports against us.

Some of those accusations include: Having Poor Performance, Fearing From Another Poor Performance, Affecting Course Reduction in Pandemic COVID-19 Situation on My Assignment, Online Teaching Experience of Dr. Heather Roberts to Hire her instead of us on Fall 2020, Preference Level Consistent, Not Meeting Minimum Qualifications due to no foreign transcript evaluation submitted in my application for the Biological Sciences Adjunct Assistant Professor pool, Business Decision to Hiring Other Persons instead of us from the Pool (Rahman Ferdosi & Abigail Analeigh) for Spring 2022 and

You can see those accusations in all 3 Losrios Position Statements in Exhibit # 57, Exhibit # 58 and Exhibit # 59. The Losrios position statement regarding this **EEOC charge # 555-2020-01235** has been placed in Exhibit # 57. You can also find my Oppositions and objections to reject and rebut all Losrios' accusations which was in Losrios' position statement in **Section IV of Attachment # 1**.


I have clarified all Losrios' Violations and Retaliations through 9 Sections (Section I to Section IX) in **Attachment # 1** of this statement (**Statement of Facts, Claims & Complaint**).

So, based on all the above clarification, explanation, statements and Exhibits, I want to kindly and respectfully ask you please grant me all **9 items** that I have requested in **Attachment # 2** of this complaint (**Statement of Relief & Demands**).

Best Regards,

Professor Dr. Sonia Sayyedalhoseini

Victim of Losrios' Violations



Sonia Sayyedalhoseini

07-31-2023

Attachment # 2:
Statement of Relief & Demands

Plaintiff: Sonia Sayyedalhosseini

VS.

Defendants: Losrios Community College District

Folsom Lake College (a branch of Losrios)

Attachment # 2: Statement of Relief & Demands

Sonia Sayyedalhossseini vs. Losrios Community College District, et al. EEOC Ch. # 555-2020-01235

As you can see in Exhibit # 1, on **EEOC investigation results letter** regarding **Charge # 555-2020-01235**, EEOC has considered all the evidence disclosed during the investigation and has determined that there is reasonable cause to believe that Respondent (Losrios Community College) did not assign Charging Party (me) courses for the Fall 2020 semester and **laid-off the Charging Party (me) in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964 as amended.**

So, based on **EEOC investigation results letter** regarding **Charge # 555-2020-01235** (in Exhibit # 1) that proves and establishes this point that violation of law happened (Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e- 17) and also according to all clarification, explanation, statement, proofs, documents, Exhibits that I mentioned to all of them in **Attachment # 1** of this complaint (**Statement of Facts, Claims & Complaint**), I want to kindly and respectfully ask the court the following relief and demands:

- 1) Please Order Losrios Community College District to grant me \$ 900,000.00 (\$ 300,000.00 for Compensatory Damages + \$ 600,000.00 for Punitive Damages) based on the size of the employer (Losrios Community College District, has more than 500 employees).
- 2) Please Order to restore me to the status I occupied prior to the discrimination (faculty member and University Professor position in Folsom Lake College of Losrios Community College District).
- 3) Please Order to all Losrios administration members which I mentioned to their names and positions below (item 4) to provide written assurance letter that Retaliation against me won't happen **again**. Never Ever.
- 4) Please Order to issue **Judicial Notice** for all of Losrios administration members who participated in discrimination against me in retaliation for engaging in protected activity, in violation of Title VII. I have clarified all of their violations in **Section III of Statement of Facts, Claims & Complaint (Attachment # 1)** .

Those Losrios administration members include: King Brian (Chancellor of Losrios), Jacob Knapp (Leadership Line Member of Losrios), Peter Khang (Director of Human Resource of losrios), Whitney Yamamura (President of FLC), Monica Pactol (Vice President of FLC & Direct Supervisor of Gregory McCormac)

- 5) Please Order to **Citizen Arrest** for Gregory McCormac (Dean of Science in FLC) who harassed me sexually, laid-off and terminated both me and my husband in retaliation for engaging in protected activity, in violation of Title VII of my Civil Rights Act of 1964 as amended. I have clarified all of Gregory McCormac's violations

Attachment # 2: Statement of Relief & Demands

Sonia Sayyedalhosseni vs. Losrios Community College District, et al. EEOC Ch. # 555-2020-01235

in Section III of Statement of Facts, Claims & Complaint (Attachment # 1) .

6) Please Order to **Citizen Arrest** for Niloofar Radgoudarzi (Losrios Lab Tech who is Gregory McCormac's girlfriend) because of all her Retaliation against me and my husband. I have clarified Niloofar Radgoudarzi's Retaliation in **Section VI of Statement of Facts, Claims & Complaint (Attachment # 1).**

7) Please Order to **Citizen Arrest** for Mehdi Radgoudarzi (Losrios Volunteer who is Niloofar Radgoudarzi's father) because of all his Retaliation against me and my husband. I have clarified Mehdi Radgoudarzi's Retaliation in **Section VII of Statement of Facts, Claims & Complaint (Attachment # 1).**

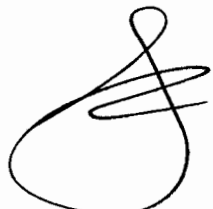
8) If the court is not willing or able to the aforementioned items 5, 6 and 7 , so please order to issue Civil Harassment Restraining Orders against Gregory McCormac (Dean of Biology Department in Losrios), Niloofar Radgoudarzi (Losrios Lab Tech) and Mehdi Radgoudarzi (Losrios Volunteer) to stop harassing me and my husband by affecting on our assignments as well as our Employment.

9) Even if the court is not willing or able to the aforementioned item 8 , so please order to Gregory McCormac (Dean of Biology Department in Losrios), Niloofar Radgoudarzi (Losrios Lab Tech) and Mehdi Radgoudarzi (Losrios Volunteer) to stay away from our workplace and job assignments to prevent of further retaliation against me and my husband.

Best Regards,

Prof. Dr. Sonia Sayyedalhosseni

Victim of Losrios Community College District's Violations

 sonia sayyedalhosseni
07-31-2023